

June 28, 2019

—Via Electronic Filing—

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

RE: REPLY COMMENTS
2018 ANNUAL SERVICE QUALITY REPORT
DOCKET NO. E002/M-19-261

Dear Mr. Wolf:

Northern States Power Company, a Minnesota corporation, doing business as Xcel Energy, submits this reply to the June 7, 2019 Comments of the Minnesota Department of Commerce in the above-referenced docket.

We appreciate the Department's thorough review of our annual report and its recommendation that the Commission accept our report. In Comments, the Department also recommended the Company provide the following reliability information:

- Historically adjusted performance and goal data using the IEEE 1366 storm normalization method from 2001 to 2018.
- 2018 performance data using the storm-normalization method the Company has used in previous filings; and

1. 2001 to 2018 Performance and Goal Data based on IEEE 1366

By way of background, in our Initial Filing we provided IEEE 1366 normalized actuals for 2010 to 2018 for our MN service territory and by our four work regions.¹ We chose 2010 as our starting point because of a change to the system we use to track outage information and the language of IEEE 1366 providing guidance on how the normalization should be performed.

¹ Docket No. E002/M-19-261, 2018 Annual Report, Attachment M, pgs 4 &5, April 1, 2019.

In late 2004, the Company initiated a new outage management system; therefore the performance for 2001 to 2004 is not exactly comparable to the 2005 and going forward performance. The performance data from 2005 to 2018 is collected from the same system; however, IEEE 1366 contemplates using five years of data to normalize the calculation of Major Event Days (MED). In explaining how to calculate Major Event Days, IEEE 1366 gives the following guidance:

Collect values of daily SAIDI for five sequential years, ending on the last day of the last complete reporting period. If fewer than five years of historical data are available, use all available historical data until five years of historical data is available.

Performance data from 2005 to 2009 would be normalized in a different way than 2010 to 2018 because we do not have five years of data from the same system upon which to base the normalization. The data is from the same system but normalization for 2005 to 2009 would be based on less than five years of data (e.g., data from 2009 would be normalized based on four years of data; 2008 on three years, 2005 couldn't be normalized based on any data at all). Thus the reason we chose to restate our performance starting with 2010.

In addition, our performance goals are based on a five-year average of actual performance, so using the IEEE 1366 normalized data based on five years of consistent data from the same system, we can provide restated goals for 2015 (using 2010 to 2014 performance) through 2018 (using 2013 to 2017 performance).

In partial response to the Department's request, in Attachment A, we provide our normalized reliability performance for 2010 to 2018 and restated goals for 2015 to 2018 based on IEEE 1366 normalization. Attachment A has been color coded green and red to indicate whether each goal would have been met or not under the IEEE 1366 method. In informal conversations with the Department, we explained the above rationale for our partial response to their request.

2. 2018 performance data consistent with previous filings' normalization

We provide our 2018 reliability performance data using the normalization method consistent with previous filings in Table 1 below.

Table 1

		2018 Performance Results	2018 Standards
Minnesota	SAIDI	92.28	NA
	SAIFI	0.87	NA
	CAIDI	105.81	NA
Metro East	SAIDI	96.26	82.69
	SAIFI	0.88	0.83
	CAIDI	108.82	99.93
Metro West	SAIDI	83.26	85.17
	SAIFI	0.87	0.83
	CAIDI	95.47	102.46
Northwest	SAIDI	99.02	89.82
	SAIFI	0.81	0.79
	CAIDI	122.63	113.45
Southeast	SAIDI	115.21	99.16*
	SAIFI	0.89	0.74*
	CAIDI	129.10	131.46**

*2018 SE SAIDI & SAIFI standard is set at 2017 level

**2018 SE CAIDI standard is set at 2018 level

To aid in comparing the two normalization methods, in Attachment B we provide performance and goal data using the previous normalization methods and formatted similar to Attachment A.

We understand the March 18, 2019 Order in Docket E002/M-18-239 did not require the Company to change the normalization method used to set our regional reliability goals. However, with the interest in seeing our performance using the IEEE normalization method, we believe we have enough historical data to set standards using IEEE. Therefore, we propose that going forward our performance is reported as ordered by the Commission² and measured with the IEEE method rather than reporting our reliability performance under two normalization methods.

² Docket No. E002/M-18-239, May 14, 2019

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

Sincerely,

/s/

GAIL A. BARANKO
REGULATORY MANAGER

c: Service List

2010-2018 Reliability Indices

Annual Rules Started 2018 Based On - IEEE 1366 Normalized - All Levels, All Causes, Regional MED's

Minnesota	2010 Actual	2011 Actual	2012 Actual	2013 Actual	2014 Actual	2015 Actual	2015 Target	2016 Actual	2016 Target	2017 Actual	2017 Target	2018 Actual	2018 Target	2019 Actual	2019 Target	9 Year Trend
SAIDI	113.86	88.17	101.86	94.27	84.00	89.95	NA	90.45	NA	75.04	NA	96.07	NA	TBD	NA	
SAIFI	1.17	0.88	0.93	0.90	0.84	0.83	NA	0.83	NA	0.74	NA	0.89	NA	TBD	NA	
CAIDI	97.31	100.53	109.78	104.60	99.67	108.09	NA	108.93	NA	100.90	NA	107.39	NA	TBD	NA	

Metro East	2010 Actual	2011 Actual	2012 Actual	2013 Actual	2014 Actual	2015 Actual	2015 Target	2016 Actual	2016 Target	2017 Actual	2017 Target	2018 Actual	2018 Target	2019 Actual	2019 Target	9 Year Trend
SAIDI	102.32	79.89	105.74	85.05	79.73	93.73	90.55	95.52	88.83	76.22	91.96	103.69	86.05	TBD	89.78	
SAIFI	1.22	0.85	0.96	0.86	0.86	0.90	0.95	0.87	0.89	0.76	0.89	0.93	0.85	TBD	0.86	
CAIDI	83.90	93.83	110.03	99.33	92.46	104.25	95.30	109.70	100.26	100.48	103.34	111.74	101.31	TBD	103.94	

Metro West	2010 Actual	2011 Actual	2012 Actual	2013 Actual	2014 Actual	2015 Actual	2015 Target	2016 Actual	2016 Target	2017 Actual	2017 Target	2018 Actual	2018 Target	2019 Actual	2019 Target	9 Year Trend
SAIDI	123.21	89.74	103.98	101.41	83.02	90.95	100.27	83.64	93.82	69.51	92.60	83.26	85.71	TBD	82.08	
SAIFI	1.22	0.90	0.98	0.96	0.84	0.84	0.98	0.82	0.91	0.71	0.89	0.87	0.84	TBD	0.82	
CAIDI	101.09	99.56	105.93	105.45	98.50	108.44	102.19	101.43	103.64	97.84	104.06	95.47	102.56	TBD	100.37	

Northwest	2010 Actual	2011 Actual	2012 Actual	2013 Actual	2014 Actual	2015 Actual	2015 Target	2016 Actual	2016 Target	2017 Actual	2017 Target	2018 Actual	2018 Target	2019 Actual	2019 Target	9 Year Trend
SAIDI	110.59	94.29	95.05	97.43	82.80	75.58	96.03	85.81	89.03	75.77	87.33	109.34	83.48	TBD	85.86	
SAIFI	0.96	0.82	0.83	0.94	0.82	0.66	0.87	0.70	0.81	0.76	0.79	0.87	0.77	TBD	0.76	
CAIDI	114.86	115.31	115.16	103.70	101.02	115.39	110.00	122.38	109.72	100.28	110.81	126.05	107.83	TBD	113.01	

Southeast	2010 Actual	2011 Actual	2012 Actual	2013 Actual	2014 Actual	2015 Actual	2015 Target	2016 Actual	2016 Target	2017 Actual	2017 Target	2018 Actual	2018 Target	2019 Actual	2019 Target	9 Year Trend
SAIDI	111.00	101.86	85.95	87.98	103.45	86.51	98.05	110.23	93.15	96.33	94.82	118.80	96.90	TBD	103.06	
SAIFI	0.98	0.90	0.67	0.73	0.80	0.75	0.82	0.85	0.77	0.84	0.76	0.92	0.79	TBD	0.83	
CAIDI	112.90	112.82	128.50	120.39	129.20	115.16	119.97	130.02	120.84	114.73	124.79	129.64	122.04	TBD	124.00	

Using 5 Year rolling actuals to calculate current year targets

Southeast	2010 Actual	2011 Actual	2012 Actual	2013 Actual	2014 Actual	2015 Actual	2015 Target	2016 Actual	2016 Target	2017 Actual	2017 Target	2018 Actual	2018 Target ¹	2019 Actual	2019 Target ¹	9 Year Trend
SAIDI	111.00	101.86	85.95	87.98	103.45	86.51	98.05	110.23	93.15	96.33	94.82	118.80	94.82	TBD	94.82	
SAIFI	0.98	0.90	0.67	0.73	0.80	0.75	0.82	0.85	0.77	0.84	0.76	0.92	0.76	TBD	0.76	
CAIDI	112.90	112.82	128.50	120.39	129.20	115.16	119.97	130.02	120.84	114.73	124.79	129.64	122.04	TBD	122.04	

¹ Using mandated 2018 & 2019 SAIDI and SAIFI targets set at 2017 levels & CAIDI targets set at 2018 level

2010-2018 Reliability Indices

Annual Rules - Normalization based on prior 5 years count of sustained outages, \geq Avg+3 Std Dev/day - All Levels, All Causes, Regional MED's

Minnesota	2010 Actual	2011 Actual	2012 Actual	2013 Actual	2014 Actual	2015 Actual	2015 Target	2016 Actual	2016 Target	2017 Actual	2017 Target	2018 Actual	2018 Target	2019 Actual	2019 Target	9 Year Trend
SAIDI	101.99	81.10	99.00	93.73	86.63	92.08	NA	89.43	NA	70.85	NA	92.28	NA	TBD	NA	
SAIFI	1.10	0.82	0.90	0.88	0.84	0.84	NA	0.82	NA	0.72	NA	0.87	NA	TBD	NA	
CAIDI	92.54	98.75	109.47	106.06	102.63	110.02	NA	108.92	NA	98.63	NA	105.81	NA	TBD	NA	

Metro East	2010 Actual	2011 Actual	2012 Actual	2013 Actual	2014 Actual	2015 Actual	2015 Target	2016 Actual	2016 Target	2017 Actual	2017 Target	2018 Actual	2018 Target	2019 Actual	2019 Target	9 Year Trend
SAIDI	88.30	69.89	98.35	81.28	79.73	101.38	83.51	84.89	86.13	66.17	89.13	96.26	82.69	TBD	85.69	
SAIFI	1.15	0.78	0.91	0.83	0.86	0.92	0.91	0.82	0.86	0.69	0.87	0.88	0.83	TBD	0.84	
CAIDI	76.87	89.61	108.36	97.75	92.46	109.67	92.17	102.91	100.01	95.33	102.42	108.82	99.93	TBD	102.24	

Metro West	2010 Actual	2011 Actual	2012 Actual	2013 Actual	2014 Actual	2015 Actual	2015 Target	2016 Actual	2016 Target	2017 Actual	2017 Target	2018 Actual	2018 Target	2019 Actual	2019 Target	9 Year Trend
SAIDI	114.85	85.07	103.98	98.71	83.02	90.95	97.13	83.64	92.35	69.51	92.06	83.26	85.17	TBD	82.08	
SAIFI	1.19	0.87	0.98	0.94	0.84	0.84	0.96	0.82	0.89	0.71	0.89	0.87	0.83	TBD	0.82	
CAIDI	96.49	98.20	105.93	105.09	98.50	108.44	100.75	101.43	103.33	97.84	103.98	95.47	102.46	TBD	100.37	

Northwest	2010 Actual	2011 Actual	2012 Actual	2013 Actual	2014 Actual	2015 Actual	2015 Target	2016 Actual	2016 Target	2017 Actual	2017 Target	2018 Actual	2018 Target	2019 Actual	2019 Target	9 Year Trend
SAIDI	84.02	103.27	106.07	95.90	82.80	75.27	94.41	119.36	92.66	75.77	95.88	99.02	89.82	TBD	90.45	
SAIFI	0.77	0.85	0.84	0.93	0.82	0.65	0.84	0.80	0.82	0.76	0.81	0.81	0.79	TBD	0.77	
CAIDI	108.70	122.13	125.62	102.86	101.02	115.32	112.00	149.53	113.15	100.28	118.45	122.63	113.45	TBD	117.96	

Southeast	2010 Actual	2011 Actual	2012 Actual	2013 Actual	2014 Actual	2015 Actual	2015 Target	2016 Actual	2016 Target	2017 Actual	2017 Target	2018 Actual	2018 Target	2019 Actual	2019 Target	9 Year Trend
SAIDI	103.67	78.15	71.54	108.83	129.20	82.96	98.28	103.28	94.14	87.67	99.16	115.21	102.39	TBD	103.67	
SAIFI	0.86	0.72	0.59	0.75	0.81	0.72	0.75	0.81	0.72	0.80	0.74	0.89	0.78	TBD	0.81	
CAIDI	121.07	107.92	120.50	145.11	158.78	115.64	131.46	126.85	130.78	109.73	134.40	129.10	131.46	TBD	128.40	

Using 5 Year rolling actuals to calculate current year targets

Southeast	2010 Actual	2011 Actual	2012 Actual	2013 Actual	2014 Actual	2015 Actual	2015 Target	2016 Actual	2016 Target	2017 Actual	2017 Target	2018 Actual	2018 Target ¹	2019 Actual	2019 Target ¹	9 Year Trend
SAIDI	103.67	78.15	71.54	108.83	129.20	82.96	98.28	103.28	94.14	87.67	99.16	115.21	99.16	TBD	99.16	
SAIFI	0.86	0.72	0.59	0.75	0.81	0.72	0.75	0.81	0.72	0.80	0.74	0.89	0.74	TBD	0.74	
CAIDI	121.07	107.92	120.50	145.11	158.78	115.64	131.46	126.85	130.78	109.73	134.40	129.10	131.46	TBD	131.46	

¹ Using mandated 2018 & 2019 SAIDI and SAIFI targets set at 2017 levels & CAIDI targets set at 2018 level

CERTIFICATE OF SERVICE

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

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

xx by electronic filing.

MPUC Docket No: E002/M-19-261

Dated this 28th day of June 2019

/s/

Paget Pengelly
Regulatory Administrator

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