

July 22, 2025

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

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

Dear Mr. Bull:

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

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

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

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

The Department requested additional information from Xcel via Information Requests. The Department will formalize its recommendation in its Reply Comments. The Department is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

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

KB/RW/YZ/ar
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce

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

I. INTRODUCTION

The Minnesota Department of Commerce, Division of Energy Resources (Department) provides its initial comments on Xcel's Petition filed in Docket Nos. E, G002/M-12-383 and E, G002/CI-02-2034.

In Xcel's 2024 Annual Report, filed on May 15, 2025, the Company outlines its performance under the Quality Service Plan (QSP) Tariff and proposes a disbursement plan and tariff modifications.¹ Pursuant to the standards outlined in the Company's QSP Tariff, Xcel reported compliance with five metrics and exceeded the established thresholds for two metrics: (1) customer complaint levels, and (2) telephone response time. In accordance with the provisions of the QSP Tariff, the Company incurred \$2 million in penalties.² Xcel proposes to return 50 percent of the customer complaint penalty through bill credits to past due customers and use 50 percent of the telephone response penalty to accelerate the deployment of a Live Chat function.³

Additionally, the Company proposes the following modifications to the QSP Tariff, effective 2026:

- An "update to the basis years for the Customer Complaints standard, which is currently derived from data spanning 2005 through 2011;" and
- A clarification to the QSP Tariff definition of "Customer Complaint."⁴

II. PROCEDURAL BACKGROUND

August 12, 2013 The Public Utilities Commission (Commission) issues an Order approving a customer complaint performance threshold of ≤ 0.02059 per 1,000 customers.⁵

¹ 2024 Annual Report Quality of Service Plan (QSP) Tariff, Xcel Energy, Initial Filing, May 15, 2025, Docket No. E, G-002/CI-02-2034, (eDockets) [20255-218968-01](#), at 2 (hereinafter "2024 QSP Report").

² In the Matter of an Investigation and Audit of Service Quality Reporting – Fraudwise Report, In the Matter of the Petition of Northern States Power Co. d/b/a Xcel Energy for Approval of Amendments to its Natural Gas and Electric Service Quality Tariffs, Notice of Comment Period, June 6, 2025 Docket No. E, G-002/CI-02-2034, (eDockets) [20256-219663-01](#), at 2.

³ 2024 QSP Report, at 2 (hereinafter "NOC").

⁴ Ibid.

⁵ In the Matter of the Petition of Northern States Power Company d/b/a Xcel Energy for Approval of Amendments to its Natural Gas and Electric Service-Quality Tariffs, In the Matter of an Investigation and Audits of Northern States Power Company's Service-Quality Reporting, Commission, Order Approving Amendments to Service-Quality Tariff, August 12, 2013, Docket No. E, G-002/CI-02-2034, (eDockets) [20138-90198-02](#).

February 18, 2021	The Commission issues an Order under which Xcel pays an underperformance penalty due to exceeding the threshold for customer complaints. ⁶
October 9, 2024	The Commission issues an Order requiring Xcel to pay an underperformance penalty for exceeding the threshold for customer complaints. The Commission directs parties to discuss redistribution of underperformance payments on customer bills and adjustment of the penalty for inflation in the 2024 QSP [...] ⁷
May 15, 2025	Xcel files the 2024 QSP annual report with a proposed disbursement plan and tariff modifications. The Company reports exceeding the established thresholds for customer complaint levels and telephone response time. ⁸
June 6, 2025	The Commission posts a notice of comment period for the annual report. ⁹

Topic(s) open for comment:

- Should the Commission find that Xcel Energy exceeded the customer complaint threshold and telephone response time threshold as set by its QSP Tariff?
- Should the Commission accept Xcel Energy's 2024 Annual QSP report?
- Should the Commission approve Xcel Energy's proposal to use 50% of the Customer Complaint underperformance penalty for bill credits to past due customers?
- Should the Commission approve Xcel Energy's proposal to use 50% of the Telephone Response Time underperformance penalty for deployment of its Live Chat function?
- Should the Commission approve Xcel Energy's proposal to update the customer complaints standard to less than or equal to 0.649 complaints per 1,000 customers?
- Should the Commission approve Xcel Energy's proposal to update the definition of 'Customer Complaint' in its Electric Rate Book, Section No. 6, Service Quality?
- Should the Commission require an inflation adjustment to the underperformance penalty per the Commission's October 9, 2024, Order?
- Are there other issues or concerns related to this matter?

⁶ *In the Matter of an Investigation and Audits of Northern States Power Company's Service-Quality Reporting, In the Matter of the Petition of Northern States Power Company d/b/a Xcel Energy for Approval of Amendments to its Natural Gas and Electric Service-Quality Tariffs*, Commission, *Order Accepting Filing and Denying Request to Exclude Complaints*, February 18, 2021, Docket No. E,G-002/CI-02-2034, (eDockets) [20212-173621-02](#).

⁷ *In the Matter of an Investigation and Audits of Northern States Power Company's Service-Quality Reporting, In the Matter of the Petition of Northern States Power Company d/b/a Xcel Energy for Approval of Amendments to its Natural Gas and Electric Service-Quality Tariffs*, Commission, *Order Accepting Filing and Denying Request to Exclude Complaints*, Commission, *Order on Distribution of Underperformance Penalty*, October 9, 2024, Docket No. E,G-002/CI-02-2034, (eDockets) [202410-210844-02](#) (hereinafter "October 9, 2024 Order").

⁸ 2024 QSP Report.

⁹ NOC.

III. DEPARTMENT ANALYSIS

In 1997, the Minnesota Office of the Attorney General (OAG), brought forward numerous complaints from Xcel's customers about the Company's meter reading and bill performance. In the resulting Order and Settlement, Xcel (then "Northern States Power") agreed to provide one-time bill credits or refunds, make contributions to supplement energy assistance programs and for customer education, and to enter a Service Quality Plan.¹⁰

In 2002, the Commission directed the OAG and the Department to arrange for an audit and investigation of Xcel's repair and maintenance records; the focus of the investigation and audit was Xcel's service quality and the accuracy of Xcel's reports of its service quality.¹¹ The outcome of the investigation and audit found that Xcel's reporting practices were "corrupt" and fraught with significant inaccuracies due to the many schemes employed by Xcel to minimize outage durations.¹²

In early 2004, the Commission approved a settlement that set standards for service quality as well as penalties for failure to meet the established standard.¹³ In late 2004, Xcel implemented a new Outage Management System and many of the deficiencies identified in the investigation and audit were addressed.¹⁴

In the years since the QSP was established, Xcel has both met its service quality standards (avoiding penalties) and surpassed its standards (incurring penalties). Xcel reported in its 2005 report that it had not met its standards for either electric system outage standard or its telephone response time standard. However, the Company met its standards for the next several years,¹⁵ and customer complaints have remained relatively stable until the most recent years.¹⁶

The current standards for both the customer complaint standard and the telephone response time standard were ordered in August of 2013 by the Commission. The Commission set the customer complaint threshold at less than or equal to 0.2059 complaints per 1,000 customers.¹⁷ The telephone response time threshold required 80 percent of calls during business hours to be answered within 20 seconds.¹⁸

¹⁰ *In the Matter of the Petition of Northern States Power Company d/b/a Xcel Energy for Approval of Amendments to its Natural Gas and Electric Service Quality Tariffs Originally Established in Docket No. E, G002/CI-02-2034 and In the Matter of an Investigation and Audit of Northern States Power Company's Service Quality Reporting*, Briefing Papers, PUC, November 29, 2012, Docket Nos. E, G002/CI-02-2034 and E, G002/M-12-383, (eDockets) [201211-81185-02](#) (hereinafter "2012 Briefing Papers") at 2.

¹¹ *Id.* at 3.

¹² *Ibid.*

¹³ *Id.* at 3-4.

¹⁴ *Id.* at 4.

¹⁵ 2012 Briefing Papers at 5-7. The Staff Briefing Papers state that the company did not incur a penalty in the years 2006-2010.

¹⁶ Xcel Response to Department IR 16, Attachment A. [ATTACH]

¹⁷ *In the Matter of the Petition of Northern States Power Company d/b/a Xcel Energy for Approval of Amendments to its Natural Gas and Electric Service-Quality Tariffs, In the Matter of an Investigation and Audits of Northern States Power Company's Service-Quality Reporting*, Commission, *Order Approving Amendments to Service-Quality Tariff*, August 12, 2013, Docket No. E, G-002/CI-02-2034, (eDockets) [20138-90198-02](#) (hereinafter "2013 Order"), at 3.

¹⁸ *Ibid.*

In its report of 2023, Xcel reached 759 customer complaints,¹⁹ and in its 2024 report, complaints reached 1,468.²⁰

A. *EXCEEDED THE CUSTOMER COMPLAINT THRESHOLD*

The Department responds to the following notice topic:

Should the Commission find that Xcel Energy exceeded the customer complaint threshold and telephone response time threshold as set by its QSP Tariff?

The Department reviewed Xcel's 2024 Annual QSP report as filed on May 1, 2025.

In its August 12, 2013, Order, the Commission approved Xcel's present customer complaint threshold of less than or equal to 0.2059 complaints per 1,000 customers.²¹ Xcel proposed, in the same Order to maintain its Telephone Response Threshold, citing Minn. R. 7826.1200, which requires all utilities to answer 80 percent of the calls to its office during regular business hours within 20 seconds.²²

In its current report, Xcel reports that it received 1,468 customer complaints.²³ The number of customer complaints filed with the Commission in 2024 was 283.3 percent above Xcel's tarified customer complaint standard of 383 complaints. Based on the information provided by Xcel upon request, the Department determined that, given a 2024 customer count of 1,865,879, the Company's complaint rate is 0.7868 complaints per 1,000 customers.²⁴ Additionally, the Company reported that the telephone response time metric was an average of 79.7 percent, which is below Xcel's tarified telephone response time threshold of 80 percent.²⁵ Based on the data provided by the Company, the Department finds that Xcel exceeded the customer complaint threshold and telephone response time threshold.

The Department recommends that the Commission should find that the Company exceeded the thresholds for customer complaint and telephone response time set by Xcel's Quality-of-Service-Plan Tariff.

¹⁹ *In the Matter of the Petition of Northern States Power Company d/b/a Xcel Energy for Approval of Amendments to its Natural Gas and Electric Service Quality Tariffs Originally Established in Docket No. E,G002/CI-02-2034 and In the Matter of an Investigation and Audit of Northern States Power Company's Service Quality Reporting*, 2023 Annual Report, Xcel Energy, May 1, 2024, Docket Nos. Docket Nos. E,G002/CI-02-2034 and E,G002/M-12-383, (eDockets) [20245-206277-02](#) (hereinafter "2023 QSP Report"), at 1.

²⁰ 2024 QSP Report at 3.

²¹ 2013 Order at 3.

²² *Ibid.*

²³ 2024 QSP Report at 3.

²⁴ Xcel response to Department IR 16 at Attachment A.

²⁵ 2024 QSP Report at 3.

B. ANNUAL QSP REPORT

The Department responds to the following notice topic:

Should the Commission accept Xcel Energy's 2024 Annual QSP report?

The Department recommends that the Commission accept Xcel's 2024 Annual QSP report.

C. 50% OF PENALTY FOR BILL CREDITS

The Department responds to the following notice topic:

Should the Commission approve Xcel Energy's proposal to use 50% of the Customer Complaint underperformance penalty for bill credits to past due customers?

In the 2024 Annual Report, Xcel reported that 74 percent (1,083 of 1,468) customer complaints were in the Billing & Credit category. Of those 1,083 complaints, 88 percent were in the Credit category, which includes disconnections and reconnection payment plans.²⁶ Under the QSP Tariff, the Company applies half of the penalty payment as a credit to customers, with the remaining half allocated to the budget for maintenance and repair of the Company's natural gas and electric distribution systems.²⁷

C.1. Customer Criterion

In the 2024 Annual Report, Xcel proposes to use the 50 percent of the penalty payment to issue bill credits to customers that:

- Have a past-due balance greater than \$2,000;
- Have not otherwise received energy assistance;
- Are working to pay off their bill, as demonstrated by a payment on their account in the last 90 days; and,
- Have received a notice of potential disconnection.²⁸

The Department recognizes that a lower past-due balance threshold allows broader bill credit disbursement to eligible customers. The Department does not oppose the Company's proposal to lower the threshold in Criterion #1 to a past-due balance exceeding \$2,000.

Xcel further proposes that bill credits be issued without regard to customers' geographic location, as "the bill credits were not concentrated in a few, very low-income Census Block Groups (CBG)."²⁹ Xcel

²⁶ *Ibid.*

²⁷ Northern States Power Company, *Minnesota Electric Rate Book—MPUC No.2*, Section No. 6, Sheet No. 7.6, Effective Date: August 12, 2013, Accessed: July 15, 2025, <https://xcelnew.my.salesforce.com/sfc/p/1U00000011ttV/a/8b000002yLiP/27fcisWyYTkoIndzNJOZBmaAcZfAkgpze7HiGxkTvv4>.

²⁸ *Id.* at 8.

²⁹ *Id.* at 9.

also presented alternative criteria for consideration should the Commission wish to more directly target customers in the lowest-income CBGs:

- Using a lower past-due balance in criterion #1.
- Relaxing the criterion #2 requirement of not having received the other energy assistance.
- Relaxing the criterion #3 requirement of a payment in the last 90 days, or other changes.³⁰

Xcel reported that the highest number of customers who received bill credits in a single CBG was 11 customers, while many of the other CBGs only had one or two customers who received bill credits.³¹ Currently, Xcel's Automatic Bill Credit (ABC) is expected to provide bill payment assistance to approximately 17,000 residential premises in 63 CBGs and permits bill credit layering.³² As one of the primary objectives of ABC is to provide bill payment assistance to specific CBGs facing high levels of energy burden, the Department believes that removing the geographic restriction for penalty payment bill credits could allow for customers who would not already qualify for ABC to also receive bill assistance. Therefore, the Department concludes the penalty payment bill credits need not be allocated based strictly on geographic location.

The Department recommends that the Commission approve Xcel Energy's proposal to lower the threshold in Criterion #1 to a past-due balance that exceeds \$2,000, regardless of the geographic location of residence.

C.2. Bill Credit Allotment

Xcel proposes that the Commission elect a \$500 bill credit to 1,000 customers as was ordered by the Commission for the 2023 underperformance payment.³³ The Department finds that the Company's request is reasonable.

The Department recommends that the Commission approve Xcel Energy's proposal to elect a \$500 bill credit to 1,000 customers as set forth in the October 9, 2024, Order.

D. 50% OF PENALTY FOR LIVE CHAT FUNCTION

The Department responds to the following notice topic:

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

³⁰ *Ibid.*

³¹ *Ibid.*

³² *In the Matter of Xcel Energy's Petition for an Automatic Bill Credit Pilot Program*, Xcel Energy, Compliance Filing, March 4, 2025, Docket. No. E002/M-24-173, E002/M-22-266, E002/RP-19-368, (eDockets) [20253-216020-01](#), at 2 (hereinafter "2025 ABC Filing").

³³ 2024 QSP Report at 9.

In 2024, Xcel reported that 79.7 percent of calls were answered in 20 seconds or less, missing the 80 percent performance threshold due to high call volume, severe weather events, and staffing challenges.³⁴ To investigate the question posed by the Commission, the Department requested that Xcel provide information on changes to its process for recruiting new staff and retaining existing staff in 2024. The Company identified some changes to its process for recruiting new staff and retaining existing staff. Between April 2024 and April 2025, the number of customer service representatives (CSRs) increased by over 30%, rising from 343 to 447 at month-end.³⁵

To address the Telephone Response Time underperformance, the Company proposes to allocate 50 percent of the associated financial penalty toward the accelerated implementation of a Live Chat function for customer assistance. The Company trained 16 CSRs to use the Live Chat platform. These agents processed over 400 customer requests, with reported satisfaction scores exceeding 90 percent. However, Xcel states that interactions on this platform take more time to complete, due to the need for both the customer and the agent to type responses.³⁶

The Department notes that this slower interaction time raises questions as to whether expansion of the Live Chat function is an appropriate solution to address response time shortfalls. Currently, Xcel maintains the ability to monitor and improve telephone response time throughout the year. While the Department recognizes that the Live Chat function is a pilot program, there is concern that diverting resources to a less efficient communication channel may fail to reduce customer complaints.

The Department is also concerned as to how the Company plans to fund the ongoing costs of the Live Chat function. Xcel estimates that full implementation will require approximately \$950,000, driven primarily by labor expenses.³⁷ To address this concern, the Department requested that Xcel provide additional information on the Live Chat function's responsiveness and the future associated costs.

The Department will draft a formal recommendation on Xcel Energy's proposal to use 50% of the Telephone Response Time underperformance penalty for deployment of its Live Chat function in the reply comment period.

E. CUSTOMER COMPLAINTS STANDARD

The Department responds to the following notice topic:

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

The Company provides four reasons for updating the standard for customer complaints:

- Complexity of Customer Options,
- Economic Challenges,

³⁴ *Ibid.*

³⁵ Xcel response to Department IR 13.

³⁶ *Id.* at 10.

³⁷ *Ibid.*

- New Utility Offerings/Programs, and
- Wildfire Risk

The Department addresses each of Xcel's concerns in turn below.

E.1. Complexity of Customer Options

The Company states:

When the current standard was established, there were no Advanced Metering Infrastructure (AMI) in place [...] and much less diversity and complexity of the customer options that today lead to many of the complaints the Company receives.³⁸

In its current Report, Xcel highlights the increase in customer complaints due to Advanced Metering Infrastructure (AMI) technology. Xcel states that the "integration [of AMI] merges real-time AMI data and capabilities into the outage management system to enhance outage detection, accelerate outage response, and reduce truck rolls."³⁹ Despite the changes made in 2023, the Company attributed many of the complaints filed to the introduction of AMI to many of its electric ratepayers. Xcel also states that the current variance of Minn. R. 7820.2500⁴⁰ that formally required a representative of the utility to perform a person visit prior to reconnection, to allow for remote disconnection with the use of the Company's AMI functionality has led to a greater number of customers eligible for disconnection to be actually disconnected.⁴¹ The Company believes the complaints stemming from the use of AMI for disconnections is leading to the increase in customer complaints.⁴² The Department asserts that it is reasonable for a customer to be upset by a disconnection and the challenges of establishing a reconnection plan and to seek out information from their utility regarding the circumstance; 88 percent of billing and credit complaints (74 percent of total customer complaints) were in the Credit category, focused on disconnections and reconnection payment plans.⁴³ As indicated in the October 9, 2024 Order, the Company also acknowledged the likelihood of rising disconnection levels in 2024.⁴⁴

As discussed elsewhere in these comments, the goal of the utility should be to minimize the number of complaints received rather than to increase the number of allowable complaints under the standard. The Company's measures to address economic challenges leading to disconnection are discussed in section III.E.2. and communication of new utility offerings is discussed in section III.E.3 of the present comments.

³⁸ *Id.* at 14.

³⁹ *In the Matter of Northern States Power Company's Annual Report on Safety, Reliability, and Service Quality for 2023; and Petition for Approval of Electric Reliability Standards for 2024*, Xcel Energy, Compliance Filing, April 1, 2024, Docket No. 24-27, (eDockets) [20244-204892-01](#), at 47.

⁴⁰ [Minn. R. 7820.2500](#)

⁴¹ 2024 QSP Report at 4.

⁴² *Ibid.*

⁴³ 2024 QSP Report at 3.

⁴⁴ October 9, 2024 Order at 3.

The Department concludes that the anticipated deployment of AMI and the resulting, higher levels of disconnections are not cause enough for increasing the number of allowable complaints under the customer complaints standard.

The Department requested that Xcel provided information regarding customer complaints related to the programs of concern listed by the Company, such as customer-sited solar interconnections, EV-related rate or interconnection requests, and other new utility offerings such as a new rate or disconnection protection.

Despite the overall increase in customer complaints highlighted by Xcel, the data provided by the Company in response to Department IRs 18 and 19 demonstrates that the percentage of complaints related to customer-sited solar interconnections requests and EV-related rate remains minimal. Xcel stated that EV-related rate complaints account for 0.14 percent of total of 1,468 customer complaints received in 2024.⁴⁵ Furthermore, Table 1 shows a decline in complaints regarding customer-sited solar interconnections, with only 21 complaints in 2024, accounting for 1.43 percent of the total.

Table 1: Customer Complaints for Customer-Sited Solar Interconnection Requests (2018-2024)⁴⁶

	2018	2019	2020	2021	2022	2023	2024
Complaint Total	248	396	239	258	326	759	1,468
Complaints related to customer-sited solar interconnections	0	128	20	12	19	11	21
% of Complaints	0.00%	32.32%	8.37%	4.65%	5.83%	1.45%	1.43%

Source: Xcel Energy Response to Department IR 18

The data provided by Xcel, including the small percentage of complaints related to customer-sited solar interconnection requests (1.43 percent), and with the minimal percentage of EV-related rate complaints (0.14 percent), confirms that these programs have not significantly contributed to the total number of customer complaints. Although the total number of customer complaints reported by Xcel has risen, the expanded complexity of program offerings has had limited impact on complaint volume. Accordingly, the complexity of customer programs does not provide cause to increase the number of allowable complaints under the customer complaints standard.

E.2. Economic Challenges

The Company states:

[...] ongoing challenges following the COVID pandemic have increased disconnections, which often result in complaints. [...] During the COVID peacetime emergency (March 2020 to August 2021), the Company suspended disconnections [...] led to many customers building up past-due balances they struggled to pay off after the moratorium ended. [...] Total

⁴⁵ Xcel response to Department IR 19.

⁴⁶ Xcel response to Department IR 18.

arrears (the aggregate past-due balances of all customers past due) increased from \$49 million pre-pandemic (March 2020) to a peak of \$117 million in March 2023, and are today still above \$100 million.⁴⁷

The Department acknowledges that economic challenges may be a contributing factor to customer disconnections. However, Xcel recently implemented measures specifically designed to address economic challenges faced by customers.

The Department believes that, through the ABC program, the Company acknowledges the impact of cost on service disconnections. Xcel states, “The intended outcome [of the ABC program] is that – all else equal – those households will be better able to stay current on their electric bill, reduce their arrears, avoid disconnection, and pay for other daily expenses thanks to receiving the monthly automatic bill credits.”⁴⁸ In addition, in early 2025, Xcel implemented a broad set of changes that are designed to reduce disconnections and thus lead to a reduction in complaints.⁴⁹ Pursuant to the January 13, 2025 Order concerning the Xcel’s 2023 Annual Safety, Reliability, and Service Quality Report, the Commission required the Company “to reduce its down payment requirements and modify its disconnection and payment agreement practices to include consideration of individual household financial circumstances.”⁵⁰ The Commission also required Xcel to perform additional outreach to increase participation in affordability programs that reduce bad debt. Therefore, as the changes are implemented and monitored, it is important that the Company continue to engage with customers. The Department appreciates that “the Company will continue to work with each individual customer to negotiate an affordable payment plan and connect them with available energy assistance [...]”⁵¹

As the Company has only recently implemented specific measures to reduce disconnections and disconnection complaints related to economic challenges (such as ABC and modifications to Xcel’s disconnection and payment agreement practices), the Department concludes it would be more prudent to gauge the impact of already approved programs that are meant to address the same concern, rather than increase the customer complaint threshold.

E.3. New Utility Offerings/Programs

The Company states:

[...] if the Commission orders a new practice of reconnecting disconnected customers during extreme heat or poor air quality, who would then be disconnected again when those conditions have passed. This will likely

⁴⁷ 2024 QSP Report at 14.

⁴⁸ 2025 ABC Filing at 2.

⁴⁹ *Id.* at 15.

⁵⁰ In *the Matter of Xcel Energy’s 2023 Annual Safety, Reliability and Service Quality Report*, Commission, Order Accepting Reports and Setting Additional Requirements, January 13, 2025, Docket No. E-002/M-24-27, (eDockets) [20251-213880-01](#), at 5-6.

⁵¹ *Id.* at 14.

generate a new round of complaints on disconnection, due to a practice that it will take customers some time to become accustomed to.⁵²

The Department recognizes that the new practice of reconnecting disconnected customers during extreme heat or poor air quality could lead to a short-term increase in complaints once disconnections resume, if customers are unaware of or undereducated about the program. However, the Department does not find that the temporary and anticipated shift in customer complaints justifies Xcel's proposed update to the customer complaint threshold. Deployment of a new utility program should focus on limiting the number of customer complaints about the new program by communicating with customers before they are to experience the change. A robust communication and education plan would help to limit complaints by providing customer education, multiple points of contact, and additional informational resources should a customer request it. The Department understands that customers will require a period to adjust to the new practice, consistent with the experience of implementing any new utility offering or program. However, the Department concludes that the focus of implementing a new program should be on minimizing customer complaints through proper customer education and engagement, rather than increasing the number of allowable customer complaints.

E.4. Wildfire Risk

The Company states:

[...] the Company faces risks today that we did not in the past, such as increased wildfire risk due to climate change. To mitigate that risk, the Company expects in the coming years to implement practices currently largely unknown to our customers [...] while essential to mitigate fire risk and clearly in the public interest – are almost certain to lead to an increase in complaints, at least until our customers become familiar with them. These risks and risk mitigation measures were not contemplated in the 2005-2011 period on which the Customer Complaints standard is based.⁵³

The Department acknowledges the general risk posed by wildfires. However, the Department is uncertain as to the extent to which wildfires affected the reliability of the Xcel Minnesota's system in 2024. Accordingly, the Department issued a request to the Company to provide additional detail about the impact of wildfire-related events on customers in Xcel's Minnesota service territory in 2024. In response to Department IR 21, Xcel stated that there were 457 wildfires that occurred within its Minnesota service territory in 2024, and no outages resulted from these wildfires.⁵⁴ The Company also articulated that, although wildfire-related complaints were not a concern in 2024, Minnesota customers remain relatively unfamiliar with Wildfire Safety Operations (WSO) and Public Safety Power Shutoffs (PSPS). As a result, Xcel believes that future use of WSO and PSPS mitigation tools could potentially lead to increased customer complaints.⁵⁵

⁵² *Id.* at 15.

⁵³ *Id.*

⁵⁴ Xcel response to Department IR 21

⁵⁵ *Ibid.*

While customer unfamiliarity with WSO and PSPS may lead to a temporary increase in future customer complaints, it is not clear that this potential increase justifies a revision to the customer complaint standard at this time. The Department understands that wildfires pose a risk to reliability and customer experience and reiterates the importance of education and communication, as stated above in Section III.E.3. Furthermore, given Xcel's operational experience in Colorado, it is reasonable to conclude that the Company is familiar with communication strategies related to wildfire safety and mitigation.⁵⁶ Therefore, the Department finds that Xcel could implement proactive customer education and communication to mitigate potential increases in customer complaints related to wildfires.

E.5. Calculation of the Standard

In consideration of Xcel's reasons as indicated in its 2024 Annual Report, the Department is not convinced that the Company's proposed revision to the complaint standard is reasonable. In review of the last several years of complaint data as provided in Xcel's response to Department IR 16, complaint totals did not begin to increase rapidly until the 2023 and 2024 reports.⁵⁷ Including these outlier years of particularly poor performance by Xcel in the calculation of a revised average on which to base a new customer complaint standard would ultimately skew the resulting standard from historical norms—doing less to disincentivize poor performance by the utility. As stated in 2012 Commission Briefing Papers in the present dockets:

There is an obvious problem with using average performance for setting performance thresholds. Basing standards for performance on the average performance could benefit Xcel from years of poor performance in service quality, because the years of poor performance will bring down the average. Likewise, there is a disincentive for good or superior performance because these years would raise the average. In Xcel's case, setting the UPP threshold at 1.5 or 2 standard deviations from the average, in most cases, leads to penalties only when performance metrics deteriorates to levels outside the range of performance over the seven year period on which Xcel based the average.⁵⁸

After reviewing each of the main reasons Xcel provided in its 2024 QSP Report, the Department concludes that a revision to the standard based on 1) complexity of customer options and AMI, 2) economic challenges 3) new utility offerings/programs, or 4) wildfire risk is not appropriate at this time. However, the Department understands the Company's concern that the current standard is set based upon data that is now several years old.⁵⁹ The Department is not against updating the standard to better incentivize positive utility performance and to incentivize minimizing customer complaints. The Department has requested additional information from Xcel to inform a potential revision to the

⁵⁶ Xcel Energy Colorado, *Wildfire Mitigation Plan*, (2025). Available at: https://www.xcelenergy.com/company/rates_and_regulations/filings/wildfire_mitigation_program

⁵⁷ Xcel response to Department IR 16 at Attachment A.

⁵⁸ 2012 Briefing Papers at 14

⁵⁹ 2024 QSP Report at 12.

standard or a potential tiered approach to the penalty structure. The Department will draft a formal recommendation in its reply comments after receiving the requested information from Xcel.

The Department withholds its final recommendation for Xcel Energy's proposal to update the customer complaints standard to less than or equal to 0.649 complaints per 1000 customers.

F. DEFINITION OF CUSTOMER COMPLAINT

The Department responds to the following notice topic:

Should the Commission approve Xcel Energy's proposal to update the definition of 'Customer Complaint' in its Electric Rate Book, Section No. 6, Service Quality?

The Department is concerned that the Company's proposal to modify both the definition of "customer complaint" and the complaint threshold simultaneously presents potential risk. Concurrent modification of the threshold and definition create the potential to affect the calculation of the customer complaint standard. As the standard relies on the number of complaints received, any change in definition of "customer complaint" will affect what qualifies as a complaint and thereby alter the total number of complaints included in the calculation. Combined with an adjustment to the complaint threshold, the Department believes that such changes may compromise the standard's ability to accurately measure customer complaints and ensure improved performance.

Moreover, revising the definition of customer complaint to only refer to the complaints that Xcel was unable to resolve⁶⁰ does little to incentivize the Company to reduce the total number of complaints received by the Company. Xcel states its unresolved complaints totaled 219 complaints.⁶¹ Xcel's proposed change to the definition of customer complaint would have allowed Xcel to avoid its underperformance penalty regarding the customer complaint standard, despite total customer complaints received amounting to more than triple the current standard according to its 2024 Report. To ensure transparency and accountability, the Department concludes that all complaints should be reported, not solely those that remain unresolved, as selective reporting may misrepresent performance.

The Department recommends that the Commission deny Xcel Energy's proposal to update the definition of 'Customer Complaint' in its Electric Rate Book, Section No. 6, Service Quality.

G. INFLATION ADJUSTMENT

The Department responds to the following notice topic:

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

⁶⁰ 2024 QSP Report at 16.

⁶¹ *Id.* at 4.

At this time, the Department does not find it necessary to require an inflation adjustment to the underperformance penalty per the Commission's October 9, 2024, Order. As Xcel indicated in its 2024 Annual Report, the payments are not tied to specific expenses but are penalties intended to improve Xcel's performance.⁶²

The Department does not recommend that the Commission require an inflation adjustment to the underperformance penalty per the Commission's October 9, 2024, Order.

H. OTHER ISSUES

The Department responds to the following notice topic:

Are there other issues or concerns related to this matter?

The Department has no other issues or concerns related to this matter.

IV. DEPARTMENT RECOMMENDATIONS

Based on analysis of Xcel's proposal and the information in the record, the Department has prepared recommendations, which are provided below. The recommendations correspond to the subheadings of Section III above.

A. XCEL'S 2024 QSP REPORT

- A.1. The Department recommends the Commission find that Xcel exceeded the customer complaint threshold and the telephone response time threshold.
- A.2. The Department recommends that the Commission approve Xcel's 2024 Annual QSP report.

B. 50% OF PENALTY FOR BILL CREDITS

- B.1. The Department recommends that the Commission approve Xcel Energy's proposal to lower the threshold in Criterion #1 to a past-due balance that exceeds \$2,000, regardless of the geographic location of residence.
- B.2. The Department recommends that the Commission approve Xcel Energy's proposal to elect a \$500 bill credit to 1,000 customers as set forth in the October 9, 2024, Order.

C. 50% OF PENALTY FOR LIVE CHAT FUNCTION

The Department withholds its final recommendation on Xcel Energy's proposal to use 50% of the Telephone Response Time underperformance penalty for deployment of its Live Chat function. The Department will submit a formal recommendation in the reply comment period.

⁶² *Id.* at 12.

D. CUSTOMER COMPLAINT STANDARD

The Department withholds its final recommendation for Xcel Energy's proposal to update the customer complaints standard to less than or equal to 0.649 complaints per 1000 customers. The Department will submit a formal recommendation in the reply comment period.

E. DEFINITION OF CUSTOMER COMPLAINT

The Department recommends that the Commission deny Xcel Energy's proposal to update the definition of 'Customer Complaint' in its Electric Rate Book, Section No. 6, Service Quality.

F. INFLATION ADJUSTMENT

The Department does not recommend that the Commission require an inflation adjustment to the underperformance penalty per the Commission's October 9, 2024, Order.

Attachments

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

Xcel Energy Information Request No. 13
Docket Nos.: E,G002/CI-02-2034 and E,G002/M-12-383
Response To: Minnesota Department of Commerce
Requestor: John Kundert
Date Received: May 22, 2025

Question:

Topic: Telephone Response Time

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

1. Did the Company make any changes to its process for recruiting new staff and retaining existing staff in 2024?
2. How many staff were added to this area?
3. Where are those staff located?
4. Did the Company increase the wages or benefits for these staff to improve its recruiting efforts?

Response:

1. In 2024, we enacted the following into our recruiting efforts:
 - Enhanced our job advertising in Wisconsin to attract more candidates;
 - Made updates to the Contact Center job description for clearer understanding of job expectations and responsibilities;
 - Proactively reached out to applicants through our Xcel Energy Recruiting Team to help answer any position-related questions applicants may have -- this proactive approach tries to ensure candidates are well informed of position prior to being interviewed; and
 - Provided options for selected candidates for virtual and in-person training.
2. Please see Attachment A to this response, which shows Customer Service staffing levels as of month end for 2023-2025.
3. The main contact centers are located in Eau Claire, Wisconsin and Amarillo, Texas.

4. In December 2024, we increased the starting wage for our contact center agents in Wisconsin from \$18 to \$20 per hour. This adjustment was made to better align with geographical pay standards and ensure our compensation remains competitive.

Preparer: Randy Cantu
Title: Sr Director, Contact Center Operations
Department: Contact Center Amarillo
Telephone: 806-354-6454
Date: June 2, 2025

Customer Service Representatives Staffed at month-end												
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
2023												
Residential Customer Service	234	248	292	288	270	259	250	234	228	235	221	205
Residential Credit/Collections	93	106	141	129	123	118	111	102	98	107	95	91
Business Solutions Center	22	22	22	21	22	25	26	25	25	23	24	24
Combined	349	376	455	438	415	402	387	361	351	365	340	320
2024												
Residential Customer Service	200	215	242	221	211	226	238	219	216	195	210	206
Residential Credit/Collections	85	95	97	96	83	85	85	84	84	78	87	85
Business Solutions Center	26	26	25	26	25	25	24	22	24	24	24	21
Combined	311	336	364	343	319	336	347	325	324	297	321	312
2025												
Residential Customer Service	237	250	279	299								
Residential Credit/Collections	88	92	106	120								
Business Solutions Center	25	25	29	28								
Combined	350	367	414	447								

Additional context:
Includes tenured employees and new employees in training that handle customer calls.
Excludes employees in the Personal Account Reps department, Customer Advocate departments, supervisors, support staff, back-office specialty teams, etc.

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

Xcel Energy	Information Request No.	16
Docket Nos.:	E,G002/CI-02-2034 and E,G002/M-12-383	
Response To:	Minnesota Department of Commerce	
Requestor:	John Kundert	
Date Received:	May 22, 2025	

Question:

Topic: Customer Complaint Calculation per 1,000 Customers

Reference(s): Docket No: E,G002/M-12-383 - QSP 2024 Annual Compliance Filing,
filed May 15, 2025 , page 13

Please provide an Excel spreadsheet that provides the support for the information in Table 5 in the Compliance filing.

Response:

Please see Attachment A to this response. We note that two different approaches are possible: (1) a “Complaint Coefficient” method, which yields a coefficient in number of complaints per 1,000 customers that can then be translated to a number of complaints; and (2) a “Complaint Count” method, which directly calculates a number of complaints and then the number of complaints per 1,000 customers can be back-calculated from that. We provide an illustration of both methods in Attachment A. The two methods differ only very slightly.

Preparer: Matthew Morse
Title: Principle Rate Analyst
Department: NSPM Regulatory
Telephone: 715-737-3084
Date: June 2, 2025

NSPM Response to DOC-16, Support of Table 5

Method 1 based on complaint coefficient

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

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

Method 2 based on complaint count

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

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

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

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

Xcel Energy Information Request No. 18

Docket No.: E,G002/M-12-383

Response To: Minnesota Department of Commerce

Requestor: Rachel Wiedewitsch, Krystal Binversie

Date Received: July 07, 2025

Question:

Topic: 2024 Annual Report Quality of Service Plan (QSP) Tariff (2024 QSP Report)

Reference(s): Page 14

How many customer complaints were related to customer-sited solar interconnection requests?

- Please provide a comparison of the number of customer complaints related to customer-sited solar interconnections received in each of the following years: 2024, 2023, 2022, 2021, 2020, 2019, and 2018.
- Please provide the number of complaints in this category as a percentage of the whole of the complaints received that year.
- Please provide the number of customer-sited solar interconnection requests each of the following years: 2024, 2023, 2022, 2021, 2020, 2019, and 2018.

Response:

Regarding the number of complaints received and associated percentages, please see Table 1 below.

Table 1

	2024	2023	2022	2021	2020	2019	2018
Complaint Total	1,468	759	326	258	239	396	248
Complaints related to customer-sited solar interconnections	21	11	19	12	20	128	0
% of Complaints	1.43%	1.45%	5.83%	4.65%	8.37%	32.32%	0.00%

Regarding the number of customer-sited solar interconnection requests/submissions in Minnesota, please see Table 2 below.

Table 2
Customer-Sited Solar Interconnection Applications
Received in Minnesota, by Year, 2018-2024

Submission Year	# of Applications
2018	1,313
2019	906
2020	1,506
2021	1,726
2022	2,824
2023	2,333
2024	2,759

Preparer: Robert Duenes
Title: Customer Advocate
Department: Customer Advocate
Telephone: 806-513-1493
Date: July 17, 2025

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

Xcel Energy Information Request No. 19
Docket No.: E,G002/M-12-383
Response To: Minnesota Department of Commerce
Requestor: Rachel Wiedewitsch, Krystal Binversie
Date Received: July 07, 2025

Question:

Topic: 2024 QSP Report

Reference(s): Page 14

How many customer complaints were made regarding an EV-related rate or interconnection request? Please provide a comparison of the number of customer complaints regarding EV-related rates and the total number of customers that were enrolled on an EV-related rate in 2024.

- Please include if the customer was new to the EV-related rate, or an existing customer.
- Please provide the number of complaints in this category as a percentage of the whole of the complaints received.

Response:

In 2024, the Company received two EV-related rate complaints. In 2024, the Company had 6,477 Minnesota EV program customers. One EV customer was new to the EV program, and the other was an existing customer. EV-related rate complaints account for 0.14% of total of 1,468 customer complaints received in 2024.

Preparer: Robert Duenes
Title: Customer Advocate Supervisor
Department: Customer Advocate Group
Telephone: 806-513-1493
Date: July 17, 2025

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

Xcel Energy	Information Request No.	21
Docket No.:	E,G002/M-12-383	
Response To:	Minnesota Department of Commerce	
Requestor:	Rachel Wiedewitsch, Krystal Binversie	
Date Received:	July 07, 2025	

Question:

Topic: 2024 QSP Report

Reference(s): Page 15

How many wildfires impacted Xcel's Minnesota service territory in 2024. If any, what was the impact to the reliable operations of Xcel's MN system?

- Please provide the number of customers that experienced outages due to wildfire.
- Please provide the number of complaints made that stemmed from wildfire-related outages.
- Please provide the number of complaints in this category as a percentage of the whole of the complaints received.
-

Response:

There were 457 wildfires that occurred within the Minnesota portion of the Company's service territory in 2024. None impacted Company facilities, and therefore there were no outages due to wildfire. Subsequently, there have also been no complaints stemming from any wildfire.

We emphasize, however, that the Company did not suggest wildfires, wildfire-related outages, or wildfire-related complaints in 2024 as the basis for our argument on page 15 of the QSP report. Rather, with increasing frequency and severity of wildfires expected, the Company may need to implement Wildfire Safety Operations (WSO), where the Company, during high wildfire risk conditions temporarily deactivates the automated reclosing of breakers on the distribution system to reduce ignition risk; and/or Public Safety Power Shutoffs (PSPS), where we would—as a measure of last resort—de-energize parts of our system until those conditions have passed. In 2024, from May (when Xcel began tracking this information) through the end of year, WSO was implemented 13 times. Both WSO and PSPS could result in increased and longer outages, including because the entirety of lines de-energized due to either WSO or PSPS need to be inspected before they can be re-energized. Because our Minnesota customers are relatively unfamiliar with WSO and PSPS today, it is possible that

future use of WSO and PSPS mitigation tools may generate additional customer complaints. These wildfire risks, and WSO and PSPS practices to mitigate risk, did not exist in the 2005-2011 years on which the Customer Complaints standard is based. It is not reasonable to hold the Company to a standard, and levy financial penalties for exceeding that historical standard, when the standard is based on conditions that are dissimilar from what is likely to occur going forward.

Preparer: Riaz Mohammed
Title: Wildfire Regulatory Policy Specialist
Department: WF Government, Strategy, Operation Protocols
Telephone: 802-299-0724
Date: July 17, 2025

CERTIFICATE OF SERVICE

I, Nicole Westling, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

Minnesota Department of Commerce
Comments

Docket Nos. E, G-002/M-12-383
E, G-002/CI-02-2034

Dated this **22nd** day of **July 2025**

/s/Nicole Westling

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

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
11	William	Kenworthy	will@votesolar.org			1 South Dearborn St Ste 2000 Chicago IL, 60603 United States	Electronic Service		No	12-383Official
12	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	12-383Official
13	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	12-383Official
14	Joseph L	Sathe	jsathe@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	12-383Official
15	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall, MN1180-07-MCA Minneapolis MN, 55401-1993 United States	Electronic Service		No	12-383Official
16	Bria	Shea	bria.e.shea@xcelenergy.com	Xcel Energy		414 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	12-383Official
17	James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	12-383Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	2-20341
2	Olivia	Carroll	oliviac@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St W1360 St. Paul MN, 55101 United States	Electronic Service		No	2-20341
3	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	2-20341
4	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		Yes	2-20341
5	Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis		350 South 5th Street, Suite 315M Minneapolis MN, 55415 United States	Electronic Service		No	2-20341
6	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	2-20341
7	Joseph L	Sathe	jsathe@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	2-20341
8	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall, MN1180-07-MCA Minneapolis MN, 55401-1993 United States	Electronic Service		No	2-20341
9	Russ	Stark	russ.stark@ci.stpaul.mn.us	City of St. Paul		Mayor's Office 15 W. Kellogg Blvd., Suite 390 Saint Paul MN, 55102 United States	Electronic Service		No	2-20341
10	James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	2-20341
11	Rebecca S.	Winegarden	beckwine@msn.com	Unknown		10555 Union Terrace Ln N Maple Grove MN,	Electronic Service		No	2-20341

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						55369-2622 United States				