



414 Nicollet Mall
Minneapolis, MN 55401

May 20, 2020

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

—Via Electronic Filing—

RE: AMI REMOTE DISCONNECT/RECONNECT PETITION
DOCKET NO. E002/M-22_____

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission the enclosed Petition requesting approval of changes to its tariffs and an indefinite variance from Minnesota Rule 7820.2500 to leverage capabilities of the Advanced Metering Infrastructure (AMI) we are implementing to improve service and reduce costs for customers.

We have electronically filed this document with the Commission, and copies have been served on the parties on the attached service lists. Please contact Bridget Dockter at bridget.dockter@xcelenergy.com (612) 337-2096 if you have questions regarding this filing.

SINCERELY,

/s/

BRIA E. SHEA
REGIONAL VICE PRESIDENT, REGULATORY POLICY

Attachments

c: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

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

IN THE MATTER OF THE PETITION OF
NORTHERN STATES POWER COMPANY
REQUESTING APPROVAL OF A VARIANCE
TO COMMISSION RULES REGARDING
DISCONNECTION OF SERVICE

DOCKET NO. E002/M-22_____

PETITION

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission this Petition requesting approval of changes to its tariff and an indefinite variance from Minnesota Rule 7820.2500 to leverage capabilities of the Advanced Metering Infrastructure (AMI) we are implementing to improve service and reduce costs for customers.

As the Commission is aware, we are in the process of deploying new AMI meters to replace our current Automated Meter Reading (AMR) meters and service. Two-way communication capabilities between the Company and our customers is one of the valuable benefits of the AMI meters, as it can eliminate or reduce the need to physically visit each meter to collect information or to perform software updates, for example. The AMI meters also contain an internal service switch that we can operate using the two-way communications capabilities that negates the need to make a physical field visit to perform a service reconnection or disconnection; instead, we will be able to perform these remotely. Leveraging these capabilities was part of the benefits we contemplated and outlined in our certification and cost recovery requests for AMI and our Field Area Network (FAN).¹

Minn. R. 7820.2500 requires that service be disconnected only in conjunction with a personal visit by a representative of the utility to the address where the service is

¹ See Docket Nos. E002/M-19-666 and E002/M-20-814.

rendered and an attempt to make personal contact with the customer to remedy the past due balance. The customer can avoid disconnection by paying the balance or establishing a payment arrangement with the field agent. Our records indicate that customers answer the door approximately 10 percent of the time. Of that 10 percent, approximately 18 percent of the time the customer will pay their bill in full. However, approximately 90 percent of the time, the customer does not answer the door. In that case, our field agent disconnects the electric service and leaves a card with instructions about how to reinstate electrical service. We are seeking a variance from this Rule to instead make a final contact with the customer via an additional phone call before disconnecting service. Making affirmative contact with customers via phone will allow us to avoid a significant proportion of disconnection-related field visits, which is more efficient and safer for our employees – and more likely to yield connection with the customer to avoid actual disconnection. If we are not able to make direct contact with the customer and are unable to leave a voicemail, we will still perform a field visit to attempt a final contact with the customer prior to disconnection.

That said, we understand that service disconnections have a serious impact on our customers – and so we are sensitive to the process and communications associated with service disconnection. We have a robust process that attempts to reach customers with past due balances numerous times before disconnecting service, which will continue as we transition to leverage our new remote reconnection and disconnection capabilities – plus more.

Leveraging these remote capabilities offer numerous efficiencies including: (1) the ability to remotely reconnect customers more quickly after their service has been disconnected, and (2) cost savings due to the reduced field visits currently necessary to perform service disconnections and reconnections, which reduces our O&M costs and results in (i) a lower charge to customers to reconnect their service, and (ii) lower costs to all customers as our overall arrears and bad debt expense lowers over time.

We recognize service disconnections impact our customers, so we held robust discussions with key stakeholders to make them aware of our remote capabilities and plans and provide an opportunity for input on our proposal. We further detail our stakeholder outreach in Section V.D and affirm that this Petition incorporates the feedback we received on both the processes and customer communications.

We believe these operational changes are in the public interest and respectfully request the Commission approve the following:

- An indefinite variance to Minn. R. 7820.2500 to allow the Company to perform remote disconnections at a customer property and no longer require a personal

visit, and

- Our proposed changes to the Service Reconnection Charge contained in our Electric Rate Book
- Our proposed change to the Manual Meter Reading Service Rider contained in our Electric Rate Book.

The balance of this Petition explains our current service disconnection and reconnection processes and outlines our proposed changes and variance request. We also provide several attachments, many of which are the customer communication materials we intend to use as part of this change, as follows:

A Stakeholder Engagement Power Point Deck

B Customer Communication Materials

B1 Customer Communications Letter (*Sent at the time of Disconnection Notice*)

B2 Customer Frequently Asked Questions

B3 Information Sheet on Advanced Grid Safety and Security

B4 AMI Deployment Map

B5 Smart Meter, Non-Communicating Meter Electric Customer Information Sheet

C Redline and Clean Tariff Pages

C1 General Service Rules; Changes to the Electric Service Reconnection Charge

C2 Manual Meter Reading Service Rider; addition of reference to Electric Service Reconnection Charge

D Schedule – Proposed Lower to Service Reconnection Charge

I. SUMMARY OF FILING

A one-paragraph summary is attached to this filing pursuant to Minn. R. 7829.1300, subp. 1.

II. SERVICE ON OTHER PARTIES

Pursuant to Minn. R. 7829.1300, subp. 2 and Minn. Stat. § 216.17, subd. 3, Xcel Energy has electronically filed this document. A summary of the filing has been served on all parties included on the attached service lists.

III. GENERAL FILING INFORMATION

Pursuant to Minn. R. 7829.1300, subp. 3, the Company provides the following

information.

A. Name, Address, and Telephone Number of Utility

Northern States Power Company, doing business as:
Xcel Energy
414 Nicollet Mall
Minneapolis, MN 55401
(612) 330-5500

B. Name, Address, and Telephone Number of Utility Attorney

Shubha M. Harris
Principal Attorney
Xcel Energy
414 Nicollet Mall – 401 8th Floor
Minneapolis, MN 55401
(612)-215-4517

C. Date of Filing

The date of this filing is May 20, 2022.

D. Statute Controlling Schedule for Processing the Filing

This Petition is made pursuant to Minn. Stat. § 216B.05, which generally requires tariffs to be filed with the Commission, and Minn. Stat. § 216B.16, subd. 1, which prescribes general timelines for rate and tariff changes, including, but not limited to, a requirement of 60-days’ notice prior to any rate or tariff change. Commission Rules define this filing as a “miscellaneous filing” under Minn. R. 7829.0100, subp. 11 since no determination of Xcel Energy’s overall revenue requirement is necessary. Minn. R. 7829.1400, subp. 1 and 4 permit comments in response to a miscellaneous filing to be filed within 30 days and reply comments to be filed no later than 10 days thereafter.

E. Utility Employee Responsible for Filing

Bria E. Shea
Director, Regulatory & Strategic Analysis
Xcel Energy
414 Nicollet Mall – 401 7th Floor
Minneapolis, MN 55401
(612) 330-6064

IV. MISCELLANEOUS INFORMATION

Pursuant to Minn. R. 7829.0700, the Company requests that the following persons be placed on the Commission’s official service list for this proceeding:

Shubha M. Harris
Principal Attorney
Xcel Energy
401 Nicollet Mall – 401 8th Floor
Minneapolis, MN 55401
shubha.m.harris@xcelenergy.com

Lynnette Sweet
Regulatory Administrator
Xcel Energy
401 Nicollet Mall – 401 7th Floor
Minneapolis, MN 55401
regulatory.records@xcelenergy.com

Any information requests in this proceeding should be submitted to Ms. Sweet at the Regulatory Records email address above.

V. SERVICE DISCONNECTION VARIANCE REQUEST

Minn. R. 7820.2500 governs the manner of service disconnections. It states that:

[s]ervice may be disconnected only in conjunction with a personal visit by a representative of the utility to the address where the service is rendered and an attempt to make a personal contact with a customer at the service address.

We are currently applying this Rule to customers on the Residential Service, Residential Time of Day, Small General Service, and Small General Time of Day Service rates. Our new AMI meters have the capability for remote disconnection of customer meters, because of this, we seek an indefinite variance from this Rule to no longer require a personal visit to customers participating in the rates listed above prior to disconnection. Customers who have opted out of a smart meter installation or are on a polyphase meter, are exempt from the variance and will still require a personal visit to their premises prior to disconnection. As explained throughout this Petition, the change is limited to the final step in our process whereby we will substitute an additional phone contact for the field visit. This change also involves a reduction to the Service Reconnection Charge contained in our Electric Rate Book for those customers that have an AMI meter.

A. Current Service Disconnection Process

Xcel Energy takes service disconnection very seriously and will disconnect a customer’s service only as a last resort. We have a set of guiding principles that governs how we interact with customers with past due balances and the process we

follow before disconnecting a customer's service, which we outline below:

- Make every effort to proactively support customers in resolving their past due balances and provide numerous opportunities for bill resolution. This includes ongoing contact through multiple touchpoints such as United States Postal Service (USPS) mail, phone, and email, and making bill assistance information prominent on our website.
- Tailor solutions to meet each customer's unique needs, including offering payment plans, and bill payment assistance and arrearage forgiveness programs.
- Refer customers to energy assistance resources during all interactions.
- Work with customers to restore service as quickly as possible if disconnection does occur.

Our contact center agents complete semi-annual trainings to refresh and learn new skills on how to best support past due customers; these trainings include content on speaking with empathy and on how to determine whether there are any special circumstances in the home that may be affecting the customer's ability to make payments. Employees are provided a guided conversation tool to find best practice solutions when speaking with our customers. Employees are empowered to find an arrangement that best suits the customer's needs including payment arrangements with little or no down payment.

Customers receiving automated phone calls about their past due balance can link directly to our phone system to pay their bill and/or speak directly to a customer service representative. Customers receiving emails can click on a link to visit our online bill payment portal to pay, make a payment or download our mobile application, where they are also able to make a payment. Customers receiving a letter in the mail can make a payment at our website, on our mobile app, or call the Company and choose to make a payment using our automated phone system or by speaking to a customer service representative. Once a customer's past due balance goes above \$50, the Company begins an ongoing and intensive process to try and reach the customer to resolve the bill or enroll the customer in a payment plan before the account balance becomes high enough to result in a disconnection notice.

The process we use to contact customers is generally as follows:

1. *Courtesy Past Due Reminders.* Multiple emails and/or phone calls (based on customer information and preference) to attempt to resolve past due balance or enroll the customer in a payment plan.

2. *Disconnection Notice.* Mailed via United States Postal Service (USPS) to customers who have a qualifying past due balance.
3. *"1st Calls."* Typically, one phone call per week over nine weeks is placed to any customer who has a past due balance and is in an advanced stage of the pre-disconnection communications process, and thus in jeopardy of disconnection. During these calls, our representatives attempt to resolve the past due balance or enroll the customer in a payment plan.

If we are not able to make contact with the customer, the customer's account is referred to our field collection area for additional review and possible disconnection, which we describe below.

1. *Current Field Disconnection Process*

Currently, if we cannot reach the customer after all of the attempts outlined above, in accordance with Minn. R. 7820.2500 and our tariff, a Company representative (field agent) will make a personal visit to the customer's premise and attempt to make a personal contact with the customer by knocking on the door. If the customer answers the door, the field agent attempts to resolve the customer's bill or establish a payment arrangement. If the customer is able to make a payment, the field agent can accept cash, check or a money order. Approximately 90 percent of the time, the customer does not answer the door and, therefore, our field agent is not successful in making contact with the customer. At that point, the field agent will access the customer's electric meter and disconnect service. When that occurs, we leave a card on the customer's door stating that we have disconnected the customer's service and providing instructions regarding how to reinstate their electrical service.

2. *Current Reconnection of Service Process*

After a customer's service is disconnected, the customer will typically call to request service be restored. Once the customer has either resolved their past due bill or entered into a payment arrangement, a field agent will return to the customer's property and restore electrical service. Reconnection of service is typically completed on the business day after the customer reaches some type of resolution on their past due balance. In very limited situations, reconnection may take longer for a variety of reasons, including the inability to access the customer's meter due to a locked gate, an unleashed dog, or if the Company is in escalated operations following severe weather, for example. If next day restoration of service is not possible, the Company will reconnect the customer's service as soon as practicable. In all cases, a \$50 service fee for restoration of service after disconnection for non-payment is added to the

customer's bill.²

B. Process Changes to Affect Remote Service Reconnection and Disconnection






Our service disconnection process leading up to the customer's resolution of the past due balance or service disconnection will continue in accordance with our guiding principles and will also largely be the same as today, with the exception of the final step. As we noted previously, if the Commission approves our variance request, instead of a field visit, the final step in the process will be to initiate an additional phone contact. If we are successful in reaching the customer, which means we were able to speak to the customer or leave a message, we will attempt to resolve their past due balance, including enrollment in a payment plan. If we do not reach the customer directly, we will leave a voicemail. If the customer does not take action to resolve the past due balance within the next business day, we would initiate the service disconnection remotely (without attempting a field visit). If we do not make direct contact with the customer and are unable to leave a voicemail, we will still perform a field visit to attempt a final contact with the customer prior to disconnection. Remote disconnections will occur in the first half of the business day, which will provide customers the opportunity to contact us and reach some type of resolution and have their service remotely reconnected on the same day. This process is outlined below, and also illustrated in Figure 1 below

1. *Courtesy Past Due Reminders.* Multiple emails and/or phone calls (based on customer information and preference) to attempt to resolve past due balance or enroll customer in a payment plan. [*No change from current process*]
2. *Disconnection Notice.* Mailed via USPS to customers who have a qualifying past due balance. [*No change from current process*]
3. *"1st Calls."* Typically, one phone call per week over nine weeks is placed to any customer who has a past due balance and is in an advanced stage of the pre-disconnection communications process, and thus in jeopardy of disconnection. During these calls, our representatives attempt to resolve the past due balance or enroll the customer in a payment plan. [*No change from current process*]
4. *"2nd call."* One final phone call to the customer to attempt to resolve the past due balance or enroll the customer in a payment plan. If this "2nd call" does not result in direct contact with the customer or we are unable to leave a voicemail for the customer, we will perform a field visit to attempt a final

² Service Reconnection Charge is authorized on Minnesota Electric Rate Book Tariff Sheet 3, Section 6.

contact prior to disconnection.

Figure 1: Typical Process Leading Up to Electric Service Disconnection

Tactic	Missed Payment	Week 1	Week 2	Week 3	Week 4	Week 5	Week 6	Week 7	Week 8	Week 9 Current	Week 9 Phase 1	Week 9 Phase II
	Email					Email	Email		Email			
					Disconnect Notice							
	Call	Call	Call	Call	Call	Call	Call	Call	Call	Call	Call	
					Bill Displaying Past Due Charges				Bill Displaying Past Due Charges			
										Door Knock	Door Knock	Phone Call
										Disconnect at meter	Disconnect via mobile app	Disconnect remotely
										Reconnect at meter	Reconnect remotely	Reconnect remotely

As we have noted, in what we expect will be rare situations where our numerous attempts to reach the customer are not successful, we will dispatch a field agent to attempt in-person contact at the customer’s premise. If our field agent is not able to make contact with the customer and/or the customer is unable to resolve the account with our field agent, we will follow our current field agent process – leaving a door card and initiating disconnection. In this case, however, we would use our remote disconnection capabilities in the field, which will allow us to use our remote capabilities to later reconnect the customer once the past due balance is resolved – negating the need for a second field visit to reconnect.

In the event the customer did not resolve the past due balance and service is disconnected, a customer can request to have their service reconnected by calling our customer care center 24 hours per day, seven days per week. When the customer contacts us to reconnect their service and resolves the past due balance associated with the service disconnection by paying in full or entering into a payment arrangement, the customer’s account is flagged for immediate reconnection. A remote reconnection will then be completed as soon as practicable, which in many instances will be during the same business day. In the rare event the remote reconnection is not successful, a field agent will visit the property to restore power; typically, this is completed on the following business day, and in certain, rare cases may take slightly longer as we noted above.

C. Customers Who are Ineligible for Remote Reconnect and Disconnect

There are two categories of customers who will not be affected by this variance: (1) residential and non-demand business customers who opt out of having an AMI meter installed, because the non-standard meter they will receive lacks the requisite two-way communications capabilities, and (2) demand-billed business customers, because the AMI meters for demand customers do not contain the internal service switch to affect remote reconnection and disconnection. In both of these cases, it will still be necessary for field agents to attempt in-person contact prior to service disconnection.

D. Stakeholder Outreach

In recognition of the impacts to our customers from disconnection of service, we proactively engaged with key stakeholders to make them aware and solicited feedback and input on our plans to leverage the remote service reconnection and disconnection capabilities of the AMI meters, as follows:

- Minnesota Community Action Partnership,
- Energy Cents Coalition,
- Citizens Utility Board of Minnesota,
- City of Minneapolis,
- Minnesota Department of Commerce Staff, and
- Minnesota Public Utilities Commission Consumer Affairs Office and Staff.

We provide the PowerPoint slide deck that we used to guide these discussions as Attachment A to this Petition. During these discussions with stakeholders, we responded to a number of logistical questions and recommendations including:

- Q. What are the chances of disconnecting the wrong customer using the technology versus having an agent in the field verify the property with the homeowner?
- *We are not aware of that happening with this technology. A system title is entered at the time of disconnection and the system title is tied to the customer meter, so there is no possibility of accidentally disconnecting the wrong premise.*
- Q. Can you clarify the difference between the current disconnection process and the one you are proposing?
- *The current disconnection process follows a nine-week process of phone calls, emails, a disconnection notice mailed to the customer, and the past due charges displayed on the customer's monthly bill. The final step now, if a customer does not resolve the past*

due balance, is a field agent will visit their property, knock on their door and attempt to collect the payment one last time. If the customer cannot pay the amount due or does not answer the door, the agent will disconnect the meter. Under our proposed process, AMI meters have the technical capability to perform remote disconnections. In lieu of a field agent visit, we are asking to replace that final customer contact attempt with an additional phone contact.

- Q. Will customers have access to the geographical deployment of AMI meters?
- *This is included on our AMI webpage with the link include above in the Customer Education and Resources Section.*
- Q. Can at least one of the customer outreach letters include bold colors to catch the customers attention?
- *We are looking into this option.*
- Q. Can we coordinate the AMI deployment with the Department of Commerce Energy Assistance roll-out to ensure we are being sensitive to customers on LIHEAP?
- *We will coordinate and communicate the deployment to the best of our abilities.*
- Q. Can we add texting capabilities as part of our customer communication touchpoints?
- *This has been part of a system enhancement review by our system services team but is not in the list of planned enhancements at this time.*
- Q. How quickly can a customer be remotely reconnected?
- *As quickly as 15 minutes.*
- Q. Can we add a section explaining the service disconnection process to customers who opt-out of an AMI meter?
- *Customers who opt-out of an AMI meter will not receive the “Customer Letter” that accompanies a disconnection notice. This will avoid any confusion to the customer.*
- Q. Will we report on specific metrics to evaluate the change in customer behavior from the current process to a post-full variance implementation?
- *We worked with stakeholders to agree on reporting of two metrics: 1) The percent of customers flagged for disconnection who pay their disconnection amount in full in the current process versus after the variance has been implemented, and 2) The number of customers reconnected within 24 hours. If the variance is approved, we will report the evaluation criteria 12 months after full implementation to provide enough time to document customer behavior changes. Under our requested timeline, reporting would be included in our 2024 electric service quality report, filed in April 2025. This information however will not be completely reflective of the behavior change, because we will not complete our transition to AMI meters until the end of 2024. So, the*

2024 information reported in April 2025 will not be based on full deployment of AMI to our Minnesota customers.

We have encouraged our stakeholders to continue to provide additional feedback and ask questions as this process moves forward. Stakeholders also asked about customer access to general smart meter information, safety and security, and installation information such as deployment mapping. We have included samples of the information provided in section E below.

We note in addition that the Commission's Consumer Affairs Office, Energy Cents Coalition, and the Citizens Utility Board provided feedback and edits to the letter we will send to customers at the time they receive a disconnection notice that explains the new process with AMI meters. We very much appreciate their suggestions and confirm we have incorporated them into the Customer Letter we provide as Attachment B1.

We also appreciate the time these stakeholders took to meet with us and follow-up with additional feedback on our Customer Letter and evaluation suggestions.

E. Customer Education and Resources

As we have discussed, the process to communicate with customers who are behind in their monthly payments will remain the same, as will our disconnection-related written communications contained in our Electric Rate Book; the only change, upon Commission approval of our variance, is to substitute an additional phone contact for the current field visit.

We will, however, be generally making additional communications materials available to our customers about the AMI meters and our implementation of them. If Xcel Energy customers have questions about Minnesota's advanced grid and smart meter plan, they can search our weblink for [Smart Meter Installation | Customer Support | Xcel Energy](#). Amongst other educational materials, it includes a:

- Customer FAQ (Attachment C) that covers basic information on smart meters and advanced grid to meter installation and interaction,
- [Smart Meter Installation - What to Expect - YouTube](#); [the video that walks you through the installation process](#)
- An Information Sheet on Advanced Grid Safety and Security (Attachment D),
- Customer Deployment Map (Attachment E) to illustrate when and where meter installation is scheduled, and
- Smart Meter, Non-Communicating Meter Electric Customer Information Sheet

(Attachment B5) providing a sample customer bill for both Smart Meter and an Opt-Out customer.

F. New Service Reconnection Charges

Today, all of our customers are subject to the same \$50 Service Reconnection Charge.³ As we have discussed, our implementation of AMI allows for remote reconnection and disconnection of service that will result in efficiencies that we propose to pass on to customers through a lower Service Reconnection Charge. In this section, we outline a new tiered Service Reconnection Charge structure that differentiates between customers with AMI meters that have remote reconnection and disconnection capabilities – and thus would be subject to a lower fee that recognizes the efficiencies realized through use of the technology – and those that do not.

In general, all of our residential and commercial non-demand customers will receive AMI meters with the internal service switch which will enable remote disconnection and reconnection of those meters without a field visit. The meters our three-phase commercial customers and customers who opt into our Manual Meter Reading Service tariff receive are not equipped with an internal service switch, and thus those customers will be subject to a higher Service Reconnection Charge due to the ongoing need for a physical field visit to disconnect and reconnect service. To determine the appropriate charge that reflects the efficiencies we expect from leveraging the AMI remote service switch capabilities, we examined the effect of the process changes in relation to the process on which our current service charge is based.

1. Service Reconnection Charge for AMI Meters with an Internal Service Switch

Once customers receive an eligible AMI meter, they will be categorized in our system at the new lower reconnection charge, based on the lower level of costs associated with remotely reconnecting and disconnecting service. The new lower charge of \$15 for remote customer reconnections is based on the costs associated with calls our customer service representatives make before and after disconnection to customers, plus the costs associated with dispatching field agents to physically disconnect and reconnect customers for approximately 18 percent of the total reconnections and disconnections we project.⁴ To arrive at this cost, we used average pay rates for the job roles involved in the various aspects of the process combined with estimated

³ See Section 6, Sheet No. 3 in our Electric Rate Book.

⁴ We assume that we do not have the correct contact information for 15 percent of our customers and remote disconnect will not function properly for 3 percent of customers with AMI.

volumes and average times to complete the tasks.

We outline the cost components associated with our proposed Service Reconnection Charge in Table 1 below.

**Table 1:
Service Reconnection Charge Basis
Customers with Remote Service Switch Capabilities**

<u>Item</u>	<u>Amount</u>
Call Costs	\$4.27
Field Personnel	<u>\$11.83</u>
Total	\$16.10
Proposed Service Reconnection Charge	
	\$15.00

While our estimates show a \$16.10 actual cost to reconnect customers, that is based on an estimate of the total volume and the percentage that will be performed remotely and in-person, once AMI meters are fully deployed. As such, we propose to round down the charge in the favor of our customers, which also serves to ensure customers who are already having trouble paying their bills do not overpay. Please see Attachment D to this Petition for a Schedule that provides further details regarding these costs.

2. *Service Reconnection Charge for AMI Meters with no Internal Service Switch*

As we noted above, the non-standard meters that customers who opt-out of AMI receive will not have an internal service switch, and, therefore, we will not be able to remotely reconnect and disconnect those customers. This is also the case with the polyphase AMI meters that our larger customers will receive. We will therefore have to continue to make a field visit with these customers to reconnect and disconnect service, like we do today. These customers therefore should be subject to a higher charge that recognizes the higher costs associated with this activity.

Our current Service Reconnection Charge that is predicated on a physical field visit was established in 2010.⁵ We have reviewed and propose to update the current \$50 Service Reconnection Charge to \$95 to better reflect our current costs associated with sending field personnel to perform disconnections and reconnections. Since this

⁵ See *Direct Testimony of Philip J. Zins, Exhibit ___(PJZ-1), Schedule 7, Docket No. E002/GR-10-971, November 3, 2010*

Service Reconnection Charge was last updated twelve years ago, we have experienced an increase in costs from \$58.44 per disconnect, to \$99.87 per disconnect – or a 71 percent increase. Like the new \$15 charge applicable to customers with eligible remote reconnect and disconnect AMI meters, we propose to round down the service reconnection charge in customers’ favor to \$95.

Table 2 provides an outline of the cost components. We also provide Attachment E, which breaks out these costs in more detail.

**Table 2:
Service Reconnection Charge Basis
AMI Opt-Out and Polyphase Customers**

<u>Item</u>	<u>Amount</u>
Call Costs	\$4.27
Field Personnel	<u>\$95.60</u>
Total	\$99.87
Proposed Service Reconnection Charge	\$99.87

3. *Proposed Implementation of the New Tiered Fee Structure*

This Petition proposes to begin using our AMI remote reconnect and disconnect capabilities starting January 1, 2023. As such, we propose to begin charging customers with eligible AMI meters the new lower \$15 Service Reconnection Charge as soon as the AMI meter is installed on or after that date. Customers who receive an eligible AMI meter during 2022 will pay the current \$50 Service Reconnection Charge until January 1, 2023, after which they will be subject to the new lower \$15 charge. We propose customers with ineligible meters will continue to pay the current \$50 Service Reconnection Charge until our AMI deployment is fully complete, which we expect will be December 31, 2024. Effective January 1, 2025, we propose to begin charging the new higher \$95 charge that we outline above, and that is more reflective of our current costs.

Table 3 outlines the estimated AMI meter installations and associated blended Service Reconnection Charge levels, based on our most current deployment schedule.

**Table 3: Proposed Service Reconnection Charge Levels
2023-2025 Transition Period**

Year	Average AMI Installed	Average Existing AMR Meters	Reconnection Charge for Customers with Eligible AMI Meter	Reconnection Charge for Customers without AMI or with Ineligible AMI Meter
2023	745,000	655,000	\$15	\$50
2024	1,220,000	180,000	\$15	\$50
2025	1,400,000	0	\$15	\$95

We note that our proposed tiered fee structure is reflected in the redline and clean tariff sheets we propose with this Petition as Attachments C1 and C2.

G. Variance Request

Through this Petition, we seek a variance to Minn. R. 7820.2500, which governs the customer disconnection process and states:

7820.2500 MANNER OF DISCONNECTION.

Service may be disconnected only in conjunction with a personal visit by a representative of the utility to the address where the service is rendered and an attempt to make personal contact with the customer at the address. If the address is a building containing two or more dwelling units, the representative shall make a personal visit to the door of the customer's dwelling unit within the building. If security provisions in the building preclude free access on the part of the representative, the representative shall attempt to gain access to the building from the caretaker, for the purpose of attempting to make personal contact with the customer. The representative of the utility shall at all times be capable of receiving payment, if nonpayment is the cause of the disconnection of service, or the representative shall be able to certify that the cause of disconnection has been remedied by the customer.

We propose to begin the remote service disconnection process in 2023, assuming the Commission has approved our variance request by that time. We seek an indefinite variance from Minn. R. 7820.2500, so that the Company will no longer be required to make an in-person visit to customers' premises with an AMI meter prior to disconnection of service. An indefinite variance is appropriate because the remote disconnect and reconnect capabilities will be utilized for the life of our AMI meters, which is expected to be 20 years.

Minn. R. 7829.3200 provides criteria for a variance from the Commission's

Rules and states:

Subp. 1. The commission shall grant a variance to its rules when it determines that the following requirements are met:

- A. enforcement of the rule would impose an excessive burden upon the applicant or others affected by the rule;
- B. granting the variance would not adversely affect the public interest; and
- C. granting the variance would not conflict with standards imposed by law.

As further discussed below, we believe that our proposal meets the criteria for a Rule variance.

1. *Enforcement of the Rule Would Impose an Excessive Burden*

As we have described, the Company's new AMI meters have the capability to perform service disconnections and reconnections using two-way communications capabilities, which will result in Company efficiencies, improved safety, and customer savings from the reduction or elimination of physical field agent visits to customers' premises. We employ an extensive process that attempts to contact customers with past due bills to avoid disconnection, which includes numerous phone calls, emails and mailings. This variance will allow us to: (1) leverage the AMI meter capabilities to initiate a remote disconnection of service, in the event customers do not resolve their past due bills, and a remote reconnection of service upon resolution of the past due balance, (2) decrease the cost of disconnecting and reconnecting customers as a result of the associated efficiencies, including fewer truck rolls and fewer field agent visits, (3) improve safety for field agents by reducing or eliminating the need for them to attempt in-person payment from customers with past-due balances. Because our new AMI meters enable remote disconnect and reconnect capabilities, it is more efficient and safer to leverage the technology paired with increased customer communications than continuing to attempt an in-person visit to the customer's property at the time of disconnection – especially given that we do not actually reach the customer approximately 90 percent of the time. As a result, continued imposition of the rule requiring a personal visit prior to disconnection is an excessive burden.

2. *Granting the Variance Does Not Adversely Affect the Public Interest*

The public interest is not adversely affected by granting a variance, because we are substituting an affirmative additional customer contact for the field visit – meaning we will either directly speak with the customer or we are able to leave a voice message for the customer. As we have explained, field visits in practice are not very effective in reaching customers, so eliminating them does not adversely affect the public interest. Additionally, with this variance request, we propose to decrease the cost of customer reconnections to reflect the decreased cost of truck rolls and staff resources, which is

in the public interest.

3. *Variance Does Not Conflict with Standards Imposed by Law*

We are not aware of any conflict with any standards imposed by law. The Commission's rules permit variances under circumstances such as those presented here. The Commission has, in the past, approved utilities' requests to vary its Rules, including when such variances are driven by new metering technology like our Residential Electric Vehicle Service Pilot Program,⁶ or our AMI Opt-Out and Bill Content Variance request.⁷ Granting the Company's requested variance here is similarly appropriate for the reasons outlined above. In summary, because the remote reconnect and disconnect capabilities will be utilized for at least the 20-year expected life of our meters, approving our variance request from Minn. R. 7820.2500 Manner of Disconnection for an indefinite amount of time is in the public interest.

G. Proposed Tariff Sheets

We summarize the affected tariff sheets and provide redline and clean versions of our proposed Service Reconnection Tariff Sheets resulting from this variance request as Attachments C1 and C2 to this filing.

Minnesota Electric Rate Book – MPUC No. 2 (Attachment C1)

Table of Contents

Section No. 6, Sheet No. 3, Revision 4

Application for Service

Section No. 6, Original Sheet No. 3.0

⁶ See *In the Matter of Xcel Energy's Petition for Approval of a Residential Electric-Vehicle Service Pilot Program*, Docket No. E-002/M-17-817, Order Approving Pilot Program, Granting Variance, and Requiring Annual Reports (May 9, 2018).

⁷ See *In the Matter of the Petition of Northern States Power Company for Approval of Tariff Modifications and a Variance from Commission Rules to Implement Customer-Driven Operational Changes and Other Tariff Changes*, Docket No. E-002/M-17-553, Order Approving Tariff Modifications and Granting Variance (Nov. 2, 2017); *In the Matter of the Petition of CenterPoint Energy Minnesota Gas for Approval of a Variance from Minnesota Rule 7820.5300 DETERMINATION OF DELINQUENCY Related to Its Automatic Bank Draft Plan for Customer-Selected Due Dates*, Docket No. G-008/M-15-397, Order (June 22, 2015); *In the Matter of Otter Tail Power Company's 2013 Demand-Side Management Financial Incentives and Annual Filing to Update the CIP Rider*, Docket No. E-017/M-14-201, Order Approving Financial Incentive, Setting Conservation Cost Recovery Adjustment, Reducing Carrying Charges, and Varying Rules (Sept. 26, 2014).

Minnesota Electric Rate Book – MPUC No. 2 (Attachment C2)

Table of Contents

Section No. 5, Sheet No. 148, Revision 1.0

Application for Service

Section No. 5, Original Sheet No. 1.0

VII. EFFECT OF CHANGE UPON XCEL ENERGY REVENUE

There is no change to Xcel Energy revenue as a result of the proposal we make in this Petition. This filing proposes changes to our tariffs and a variance from the Minnesota Rule that requires we visit a customer premise in an attempt to make in-person contact prior to a service disconnection. The customer charges associated with our change to remote operation of the internal service switch of our new AMI meters are cost-causative and designed to be revenue-neutral to the Company and our customers.

CONCLUSION

The variance we request in this Petition is in the public interest. We respectfully request the Commission to approve the following:

- An indefinite variance to Minn. R. 7820.2500 to no longer require the Company to make an in-person visit to a customer premise prior to service disconnection for customers on a Residential Service, Residential Time of Day, Small General Service, or Small General Time of Day Service rate,
- Our proposed changes to the Service Reconnection Tariff sheets contained in our Electric Rate Book, and
- Our proposed change to the Manual Meter Reading Service Rider contained in our Electric Rate Book.

Dated: May 20, 2022

Northern States Power Company

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

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

IN THE MATTER OF THE PETITION OF
NORTHERN STATES POWER COMPANY
REQUESTING APPROVAL OF A VARIANCE
TO COMMISSION RULES REGARDING
DISCONNECTION OF SERVICE

DOCKET NO. E002/M-22-____

PETITION

SUMMARY OF FILING

Please take notice that on May 20, 2022, Northern States Power Company, doing business as Xcel Energy, filed with the Minnesota Public Utilities Commission a Petition seeking approval of changes to its tariffs and an indefinite variance from Minn. R. 7820.2500 to allow: (1) a new process for service disconnections and, (2) a phased Service Reconnection Charge structure reflective of the Company's current costs and efficiencies gained from leveraging the two-way communications and service switch capabilities of our new AMI meters.



SMART METER REMOTE CUSTOMER COMMUNICATION & DISCONNECT / RECONNECT PROCESS

February 2022

AGENDA

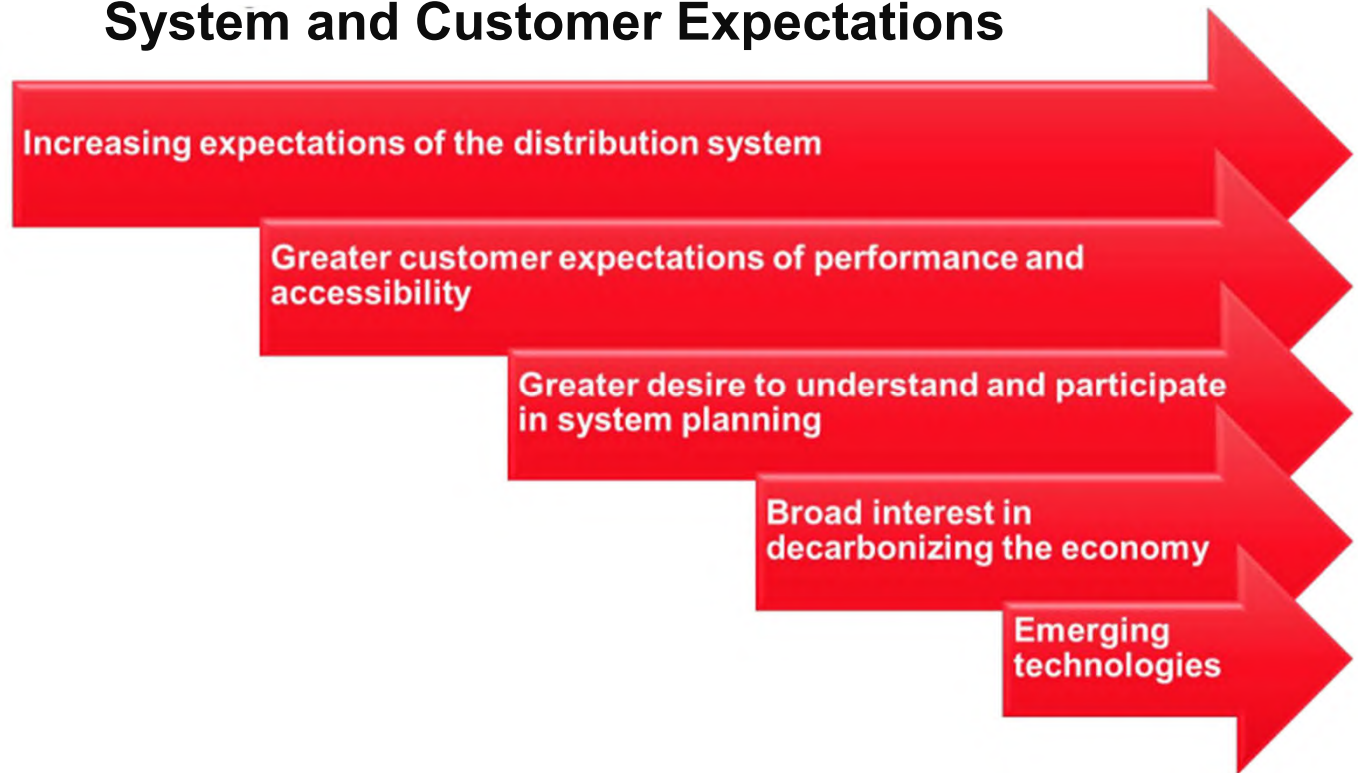
- 1. Background**
- 2. Deployment Schedule**
- 3. Guiding Principles**
- 4. Review Current & Future Customer Engagement / Disconnection / Reconnection Process**
- 5. Customer Communications**
- 6. Cost to Customers**
- 7. Questions & Feedback**



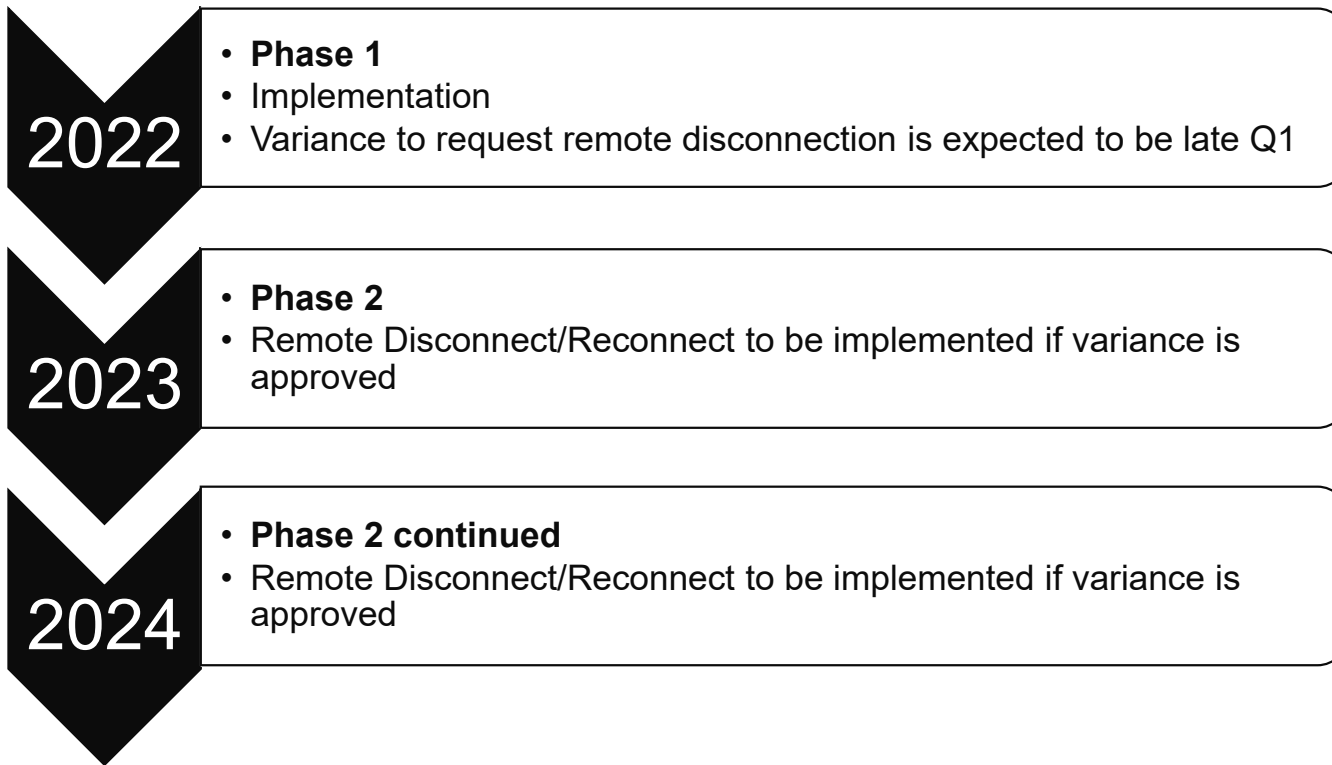
System and Customer Expectations

Background

- 2015 Commission Grid Modernization investigation opened
- 2016 Staff report supported distribution system to assist in grid evolution
- 2018 annual reporting requirements established, and Xcel Energy began reporting



Meter Deployment Schedule



Guiding Principles on Service Disconnection

Service disconnection is always a last resort.

Xcel Energy will always:

- Make every effort to proactively support customers in resolving their past due balances. This includes ongoing contact through multiple touchpoints such as mail, phone and email, and making bill assistance information prominent on our website.
- Refer customers to Energy Assistance resources during all interactions.
- Work with customers to restore service as quickly as possible if disconnection does occur.

Customer Engagement Process Prior to Disconnection

Current Disconnection Process

- Following unsuccessful attempts to engage the customer, a field agent visits the customer premises
- If a mutual solution cannot be found, field agent will disconnect
 - requires access to the premises

Remains the Same with Smart Meter Capabilities

- Customers are contacted multiple times
- Have a least nine weeks to:
 - make a payment
 - Set a payment arrangement
 - Sign up for energy assistance
 - Participation in Department EA task force
 - Connect customers with utility assistance programs

Future Customer Disconnection and Reconnection Process

If a customer has a smart meter, has a past due balance that cannot be resolved, and requires disconnection

Phase 1 Process - 2022

- A field agent will visit the customer premise and knock on the door. If the customer cannot resolve the outstanding balance per the engagement process, the field agent will initiate a remote disconnection from their vehicle.
 - Access to a customer's property no longer needed
 - Disconnection occurs 15 minutes to one hour after the door knock
 - Implementing this process incentivizes the customer to reach out for assistance options – we want to hear from them

Phase 2 Process – 2023/24

- An extra phone call will take the place of the field agent visit and door knock. If we cannot resolve the outstanding balance by the following business day, we will initiate a remote disconnection.
 - Disconnections occur in the first half of the day, allowing more time for customers to respond on the same day and reconnect service
 - Provides additional time for customer response after the final phone call
 - Implementing this process incentivizes the customer to reach out for assistance options – we want to hear from them

Customer Communications

- Direct communications to customers likely to be impacted by these changes
- Communication will explain the process changes
 - Letter mailed separately from disconnection notice addressing the Company's use of this technology for both Phase I and II (example on next slide)
- Communications continue for 60 days following the conclusion of Phase 1 and Phase 2 implementation

[Xcelenergy.com/SmartMeter](https://xcelenergy.com/SmartMeter)

MINNESOTA ADVANCED GRID AND SMART METER FAQs

INFORMATION SHEET



What is a smart meter?

A smart meter is an electrical device that measures the electricity consumption of a home or building. It allows for two-way communication between your electric meter and Xcel Energy and can help customers better understand how energy is being used and make energy-saving improvements. Smart meters also allow for quicker notifications when service will be restored.

INFORMATION SHEET
MINNESOTA ADVANCED GRID AND SMART METER FAQs

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With a non-communicating meter, your account will be limited, and you will not be able to see a breakdown of energy use data. Smart meters allow for quicker notifications when service will be restored.

Can I keep my existing meter?
No. All customers' electric meters will be replaced with smart meters. Customers will receive a smart meter notification letter in the mail.

What is a non-communicating meter?
A non-communicating meter is a meter that does not transmit data to Xcel Energy. It is not transmitted wirelessly to Xcel Energy. Your energy use data will still be updated monthly, unlike with a smart meter, which updates every four hours. With a smart meter, you will also receive high usage-related alerts and notifications about consumption by appliance, with smart meters. You will also have access to your meter data through the My Account app.

Will my smart meter affect my power?
Your smart meter will not affect your power. It will only change at this time, but will be replaced in the future.

Where will my smart meter be installed?
The smart meter will be installed at your meter location. Some customers may experience inconvenience. Our installers will be present if we can safely access your meter.

Will Xcel Energy now have more power?
No. Smart meters, like current meters, are used to monitor appliances or other items in your home. Xcel Energy does not have the authority to access your meter data for many purposes. We will continue to receive incentives for smart meter programs.

INFORMATION SHEET MINNESOTA ADVANCED GRID AND SMART METER FAQs

Can you shut my power off remotely?

With smart meters, Xcel Energy will have the capability to remotely connect and disconnect service. We will never disconnect service for past-due bills until we have contacted the customer multiple times and notified them in writing. As smart meters are installed in the coming years, if a customer is eligible for disconnection, we will knock on the door before disconnecting service – whether the disconnection happens physically at your electric meter or remotely. If you're having trouble paying your bill, please contact us at 800-895-4999 as soon as possible. We will always work with you to set up a payment plan and connect you with other resources to help.

Can my power be turned on remotely?

Yes. With smart meters, Xcel Energy can quickly start service without accessing a customer's property if service has been disconnected, or when a new customer requests to start new electric service.

Can you reconnect or disconnect any type of meter remotely?

No. Meters that are not smart meters cannot be reconnected or disconnected remotely.

Sample Disconnect / Reconnect Communications

Phase 1

Xcel Energy always wants to help customers avoid disconnection by helping find ways to resolve their past due balances. Disconnection is always used only as a last resort, and we would like to work with you to help ensure your service is not interrupted.

If you are having trouble paying your bill, please contact us at 800-895-4999 as soon as possible. We will work with you to set up a payment plan and connect you with other resources to help. You can find more information on xcelenergy.com/EnergyAssistance.

We will not disconnect service for past-due bills until we have contacted you multiple times and notified you in writing. If you have a smart meter and you are scheduled for a disconnection, we will have the capability to remotely disconnect and then reconnect your service. However, service will only be disconnected after a technician visits your property and attempts to reach you by knocking on your door. For more detailed information about smart meters, please visit xcelenergy.com/SmartMeter.

We look forward to working with you to avoid disconnection of your service.

Sincerely,
Xcel Energy

Letter will be translated in English, Spanish, Somali, and Hmong

Expected Customer Impacts Phase I and II [subject to PUC approval]

Service disconnection is always a last resort

Meter deployments are expected to begin in March of 2022.

Full deployment is expected by Q1 2025.

No changes to Xcel Energy processes around the Minnesota Cold Weather Rule are expected. Disconnections during this timeframe will be limited and comply with all Minnesota statutes and rules governing disconnection.

Based on 2019 volume we expect a peak in 2025 where an estimated 1.2% of customer base could experience disconnections per month in non CWR months. CWR volume is expected to remain under 1K disconnections per month.

These projections assume we will reach 80% of unpaid notices being worked based on our ability to make confirmed phone contact.

Benchmarking shows potential for significant reductions¹ in the volume of customers at risk of disconnection following this peak as customers adjust to the changes and begin to seek resources in advance of disconnection.

¹Peer Utility Salt River Project (SRP) observed a 25% decrease from peak disconnection volume following full implementation of remote disconnect and reconnect technology.

Cost to Customers

- Current Charge is \$50
- Post AMI Full Deployment Charge is \$15
- Transition Period: As we roll out AMI meters, propose blended rates based on average AMI meters installed.

Year	Avg. AMI	Avg. Existing	Blended Rate
2023	745,000	655,000	\$30
2024	1,220,000	180,000	\$20
2025	1,400,000	0	\$15

Questions & Feedback



Customer Communications Letter sent at the same time as the disconnection letter:



Dear Customer:

Xcel Energy always wants to help customers avoid disconnection by working to help resolve any past due balances. Disconnection is always used only as a last resort. We would like to work with you to prevent service disconnection.

If you are having trouble paying your bill, please contact us at 800-895-4999 as soon as possible. We will work with you to set up a payment plan and connect you with other resources to help. You can find more information on xcelenergy.com/EnergyAssistance.

We will not disconnect service for past due bills until we have contacted you multiple times and notified you in writing. If you have a smart meter and you are scheduled for a disconnection, we are able to remotely disconnect your service. Your service can also be reconnected remotely once you contact us to set up a payment plan. For more detailed information about smart meters, please visit xcelenergy.com/SmartMeter.

We want to work with you to avoid disconnection of your service.

Sincerely,

Xcel Energy

MINNESOTA ADVANCED GRID AND SMART METER FAQs



What is a smart meter?

A smart meter is an electrical device that measures the electricity consumption of a home or building. It allows for two-way communication between your electric meter and Xcel Energy and can help customers better understand how energy is being used and identify specific, measurable actions to make energy-saving improvements to their home or business. Smart meters can also provide quicker notifications when service is out and more accurate information on when power will be restored.

Learn more about [Advanced Grid and Smart Meters](#).

What is the advanced grid?

The next generation of our energy grid — the advanced grid — will give you more of what you expect from Xcel Energy — clean, reliable energy, and new ways to save money. New tools and technology will provide access to useful information for you about your household energy use. The advanced grid uses new technologies to deliver cleaner, more reliable energy, more ways to save money, and a better customer experience.

Visit our [Advanced Grid and Smart Meters](#) page to learn more.

How will a smart meter benefit me?

Smart meters will enhance the service we deliver to you and provide you with access to detailed energy usage information and pricing plans that can maximize your savings. New tools will help you better understand how energy is being used, manage your bill to save money, and identify specific, measurable actions to make energy-saving improvements to your home or business.

Your smart meter will work with My Account and the Xcel Energy app. Log in to see your detailed energy usage as well as tips and additional information to help you meet your energy goals.

Will I be notified before and/or after my smart meter is installed?

We'll inform you of your estimated installation month about 90 days ahead of time and remind you when we get closer. Once your smart meter is installed, you'll be equipped with a variety of information to learn more about how to take advantage of the benefits of your smart meter.

What will it cost me to receive a smart meter?

There is no direct cost to you. The cost of smart meters, in Minnesota, will be recovered from customers as part of your normal Xcel Energy bill, but you will not see a specific line item for smart meters. Also, installers from Xcel Energy or our authorized contractor will never request or accept any payment.

Can I opt out of my smart meter?

Residential customers and many small commercial customers have the option to opt out of receiving a smart meter. Customers who opt out will still receive a new meter, but it will be a non-communicating meter. Because non-communicating meters need to be read in the field, there is a monthly meter reading fee for customers who choose a non-communicating meter.

With a non-communicating meter, the energy use data you will be able to see in My Account will be limited, compared to what you would receive with a smart meter. You will not have the ability to access real-time energy information and insights and will not be able to receive high usage-related alerts. You will also not be able to see a breakdown of energy consumption by appliance, when that tool becomes available to customers with smart meters. You will also have limited access to energy and bill management tools. Visit xcelenergy.com/SmartMeter. Residential customers can also email inquire@xcelenergy.com or call **800-895-4999**. Business customers can mail bsc@xcelenergy.com or call **800-481-4700**.

Can I keep my existing meter?

No. All customers' electric meters will be replaced in the next several years. Customers will receive a smart meter, or, if you opt out of a smart meter, you will receive a new, non-communicating meter.

What is a non-communicating meter?

A non-communicating meter is a meter that measures your electric use in time-based increments, just like a smart meter, but unlike a smart meter, that information is not transmitted wirelessly to Xcel Energy. That means your meter must be manually read each month, for which there is a monthly meter-reading fee added to your bill. Your energy use data will still be available in My Account, however, it will only be updated monthly, unlike with a smart meter, which updates the data available to you every four hours. With a non-communicating meter, you will also not be able to receive high usage-related alerts, and will not be able to see a breakdown of energy consumption by appliance, when that tool becomes available to customers with smart meters. You will also have limited access to energy and bill management tools.

Will my smart meter affect my current electricity rate?

Your smart meter will not affect your current pricing plan. Your electric rates are not changing at this time, but smart meters will allow for the possibility of new rate plans in the future.

Where will my smart meter be installed?

The smart meter will be installed in the same location as your existing meter.

Will my power be interrupted during my smart meter installation?

Some customers may experience a brief power interruption. We apologize for any inconvenience. Our installers will knock on your door to let you know, but you don't need to be present if we can safely access your meter. Please make sure there is nothing preventing access to your meter like locked gates or doors, dogs, or lawn furniture.

Will Xcel Energy now have more control over my energy use with the smart meter?

No. Smart meters, like current meters, only read energy use — they cannot control appliances or other items in your home.

Will Xcel Energy use smart meters to shut off my appliances when demand is high?

No. Xcel Energy does not have the ability to shut off your appliances. However, the company has for many years had optional programs customers can sign up for to receive incentives for managing air conditioner use at peak times, and those programs will continue to be available.

Can you shut my power off remotely?

With smart meters, Xcel Energy will have the capability to remotely connect and disconnect service. We will never disconnect service for past-due bills until we have contacted the customer multiple times and notified them in writing. As smart meters are installed in the coming years, if a customer is eligible for disconnection, we will knock on the door before disconnecting service – whether the disconnection happens physically at your electric meter or remotely. If you're having trouble paying your bill, please contact us at 800-895-4999 as soon as possible. We will always work with you to set up a payment plan and connect you with other resources to help.

Can my power be turned on remotely?

Yes. With smart meters, Xcel Energy can quickly start service without accessing a customer's property if service has been disconnected, or when a new customer requests to start new electric service.

Can you reconnect or disconnect any type of meter remotely?

No. Meters that are not smart meters cannot be reconnected or disconnected remotely.

Will the smart meter compromise my personal security or privacy?

No. Protecting your data is extremely important to us. Energy use data is securely transferred electronically from the smart meter, eliminating the need for manual meter reading or estimates, which also helps reduce cost.

The information collected from all our meters (and any personal information you provide us) is used only for purposes directly related to providing you with energy service. We do not sell or otherwise disclose information about you except to our vendors that perform services on our behalf, to comply with legal requirements, or with your consent. For more details, you can review the [Xcel Energy Privacy Policy](#) on xcelenergy.com.

Are smart meters safe?

Yes, smart meters are safe. They communicate using radio frequency (RF) signals that emit the same type of low-energy radiation that most of us are exposed to every day from WiFi, Bluetooth, and airport body scanners. This level of radio frequency is approved by the [Federal Communications Commission](#) (external link). Smart meters transmit radio frequency energy for only a few minutes each day and that energy is weakened by walls and other surrounding materials.

No evidence has been found of smart meters causing health issues. According to the [American Cancer Society](#) (external link), radio frequency radiation does not cause cancer by damaging DNA, and RF radiation does not have enough energy to remove charged particles, such as electrons, and therefore is too weak to damage DNA or cause health complications.

Learn more about RF signals on our [Advanced Grid Safety And Security Information Sheet](#) (PDF).

If I have a medical condition, will my smart meter installation impact any equipment in my home?

Customers with a medical exemption will still get a smart meter. You can email us at inquire@xcelenergy.com or call us at **800-895-4999** with questions.

How will the smart meter interact with my thermostat?

Your smart meter will interact the same as your current meter. We do not currently have plans to share information between the meter and a smart thermostat, so your smart meter will not communicate directly with your thermostat.

If you are an AC Rewards/Saver's Switch® customer, your smart meter will not affect these programs. You will, however, be able to see more information about your energy usage in My Account or the Xcel Energy mobile app.

What do the scrolling numbers mean on my smart meter display?

Your smart meter's display will look different from the display on your previous meter. Your new smart meter has a digital display that cycles through meter information. Many of these items do not affect your bill. The easiest and best way to track your electric usage is through My Account. Visit xcelenergy.com, log into My Account and click on My Energy to view your daily usage, get energy conservation tips, and earn points for completing simple energy-related tasks. To learn more information about the smart meter scrolling displays, view our [Smart Meter Screen FAQ Information Sheet](#) (PDF).

Can I choose not to receive a smart meter?

It is possible to opt out of receiving a smart meter and receive a non-communicating meter instead, which comes with a monthly meter reading fee. With a non-communicating meter, the energy use data you will be able to see in My Account will be limited, compared to what you would receive with a smart meter. You will not have the ability to access real-time energy information and insights and will not be able to receive high usage-related alerts. You will also not be able to see a breakdown of energy consumption by appliance, when that tool becomes available to customers with smart meters. You will also have limited access to energy and bill management tools. Visit xcelenergy.com/SmartMeter, email us at inquire@xcelenergy.com, or call us at **800-895-4999** to learn how to opt out and the fees associated with opting out of a smart meter.

I'm a solar customer. How will I be affected?

Energy produced during a tier will be credited at that tier's rate. Solar customers may see high production credits because the higher cost during On-Peak hours will coincide with high production sun hours. To learn more, visit xcelenergy.com/SmartMeter. Residential customers can also email inquire@xcelenergy.com or call **800-895-4999**. Business customers can email bsc@xcelenergy.com or call **800-481-4700**.

How can I tell if my meter is a smart meter?

If your meter is a smart meter, the Meter Model number will be either be **I2Y210** or **D2Y210** in the lower center area of the meter.

If I need help after my smart meter is installed, who can assist me?

If you need assistance after your smart meter is installed, visit xcelenergy.com/SmartMeter. Residential customers can also email inquire@xcelenergy.com or call **800-895-4999**. Business customers can email bsc@xcelenergy.com or call **800-481-4700**.



ADVANCED GRID SAFETY AND SECURITY

INFORMATION SHEET



Technology is advancing in every area of our lives, and Xcel Energy is using digital technology to help bring you cleaner, safer, more reliable energy. The next generation of our energy grid—the advanced grid — will help us serve you better. Xcel Energy will install smart meters at customer homes over the next five years as part of building the advanced grid.

New, smart meters are an important part of building this advanced grid. Smart meters are not new to the electric utility industry as there are nearly 98 million smart meters already in place across the U.S. Xcel Energy will use smart meters to improve the customer experience and advance our utility operations. Since the technology is new to Xcel Energy customers, we want to make sure you know there are no health or safety concerns related to smart meters.

Understanding Radio Frequency Technology

Smart meters use radio frequency technology, but with significantly lower radio frequency levels than cell phones, most home appliances and WiFi routers. Xcel Energy’s smart meters will emit radio frequency lower than the Federal Communications Commission (FCC) guidelines established to protect the public. All Xcel Energy meter systems are fully authorized, licensed and in compliance with the FCC’s guidelines.

Quick Facts about Safety and Security

Customers will control how they use electricity.

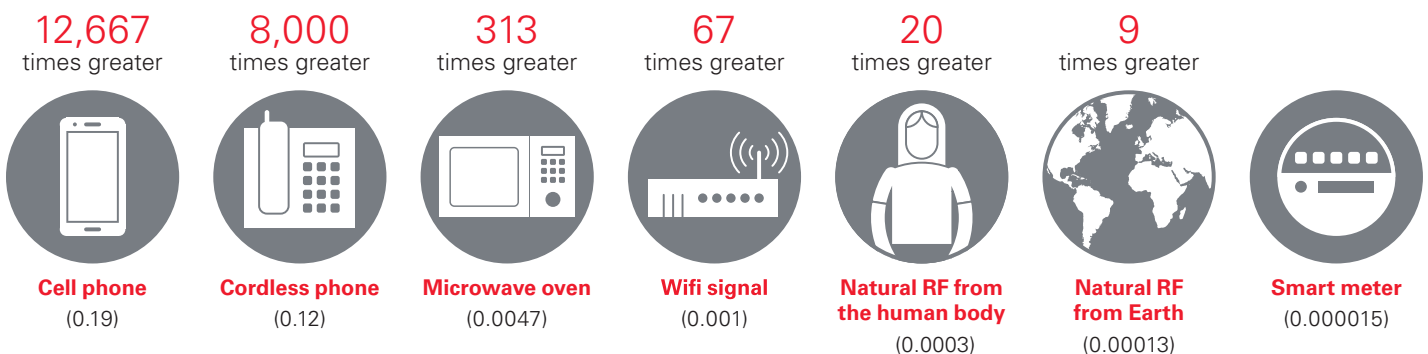
Smart meters will provide advanced measuring and troubleshooting features. These meters will not control your appliances or other items in the home. In the future, these meters will help you to understand what appliances are using the most energy, giving you transparency and more control over your energy usage.

Security you can trust.

We provide security you can trust. Protecting your data is extremely important to us. We use multiple layers of defense to ensure all data is secure and protected. Energy use data will be securely transferred electronically from the smart meter, eliminating the need for manual meter reading or estimates, which also helps reduce cost. More information on **Xcel Energy’s Privacy Policy** can be found on [xcelenergy.com](https://www.xcelenergy.com).

Radio Frequency Levels in Common Household Devices

Source: Federal Communications Commission



ADVANCED GRID SAFETY AND SECURITY

There are no health concerns with smart meters.

No evidence has been found of smart meters causing health issues. There are 98 million smart meters already installed in the United States that meet or exceed the FCC requirements. Many of the components in smart meters are the same as what's inside existing meters. The RF signals emit the same type of low-energy radiation that most of us are exposed to every day from WiFi, Bluetooth, and cell phones. According to the American Cancer Society, RF radiation does not cause cancer. RF radiation does not have enough energy to remove charged particles, such as electrons, and therefore is too weak to damage DNA or cause health complications.

The resources linked below offer additional information on Radio Frequency and Advanced Metering Infrastructure:

- **Electric Power Research Institute, A Perspective on Radio-Frequency Exposure Associated with Residential Automatic Meter Reading Technology**
- **Electric Power Research Institute, Radio-Frequency Exposure Levels from Smart Meters: A Case Study of One Model**
- **Edison Electric Institute, Smart Meters and Your Health**
- **American Cancer Society, About Smart Meters**
- **Smart Energy Consumer Collaborative, Radio Frequency Fact Sheet**
- **Smart Energy Consumer Collaborative, Myths vs. Facts: The Truth about Smart Meters Fact Sheet**
- **California Council on Science & Technology, Health Impacts of RF Exposure from Smart Meters**
- **FCC Office of Engineering and Technology, Radio Frequency Safety Frequently Asked Questions**



Minnesota Smart Meter Installation Map 2022



Q1:

January – March

Minneapolis areas surrounding Flex Pricing Pilot but not including Flex Pricing Pilot footprint



Q2:

April – June

Minneapolis, St Louis Park, Golden Valley, Hopkins, Edina



Q3:

July – September

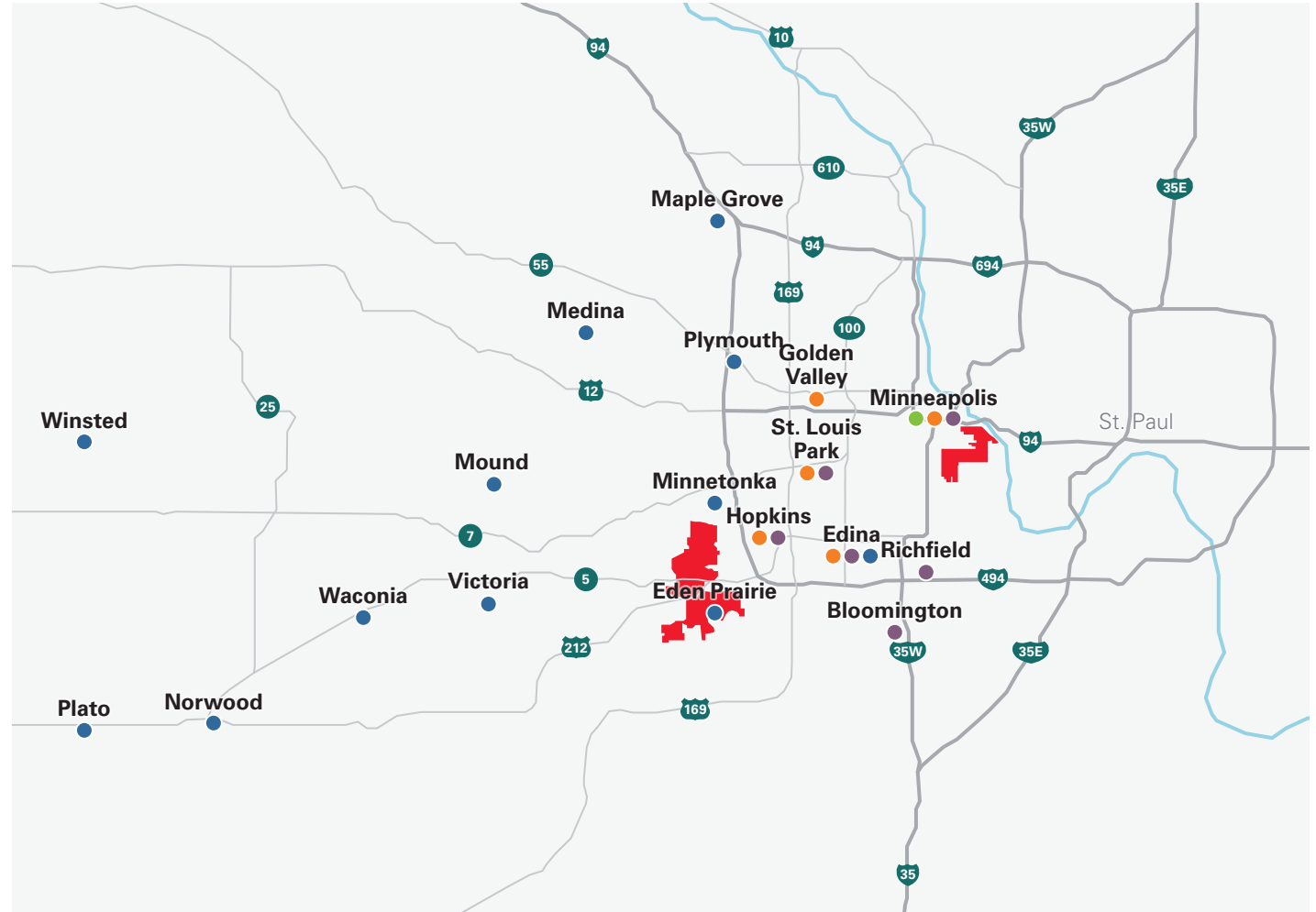
Minneapolis, St Louis Park, Hopkins, Edina, Richfield, Bloomington



Q4:

October – December

Edina, Minnetonka, Plymouth, Medina, Eden Prairie, Mound, Victoria, Waconia, Winsted, Plato, Norwood, Maple Grove



 Flex Pricing Pilot areas

ELECTRIC BILLS FOR CUSTOMERS WITH SMART METERS OR NON-COMMUNICATING METERS



Once you receive your smart electric meter or non-communicating meter, your monthly electric bill will look different than it does today.

Previously, your bill showed your total energy use for the billing period, based on your current and previous month's meter readings.

Previous electric meter usage detail example

METER READING INFORMATION			
METER NUMBER: 0000000000		Read Dates: MM/DD/YY – MM/DD/YY (00 Days)	
DESCRIPTION	CURRENT READING	PREVIOUS READING	USAGE
Total Energy	00000 Actual	00000 Actual	000 kWh

Once you have a smart meter or non-communicating meter, your bill will look like the example below.

Smart electric meter or non-communicating meter usage detail example

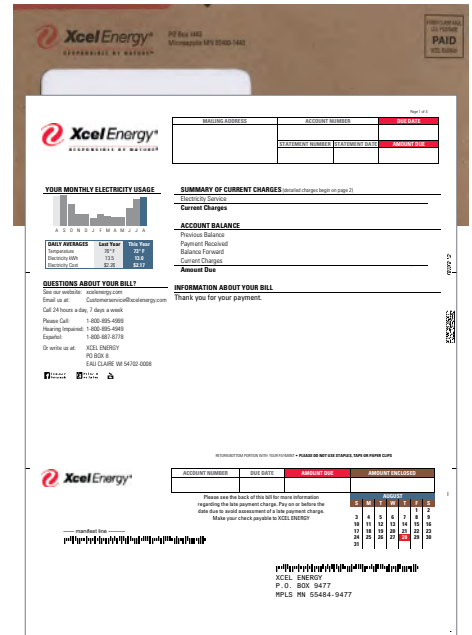
METER READING INFORMATION		
METER	Read Dates: 04/05/20 - 05/04/20 (29 Days)	
DESCRIPTION	USAGE TYPE	USAGE
Total Energy	Actual	267 kWh

Your total electric usage for the month is shown in the "usage" field. Your bill will no longer show "current" and "previous" meter read numbers.

Smart meters and non-communicating meters track your energy use in 15-minute intervals. Your bill is based on the total kWh you used in each of the intervals for the billing period.

Your electric rates are not changing at this time, but smart meters will allow for the possibility of new rate plans in the future.

If you have set up auto-payments with Xcel Energy, the autopayment will continue and no action is needed.



Visit xcelenergy.com/SmartMeter, email us at inquire@xcelenergy.com, or call us at **800-895-4999** to learn more. You can also sign up at xcelenergy.com/MyAccount to enroll in **paperless** billing and find other helpful information.

Redline

SECTION 1 GENERAL SERVICE RULES

1.1 APPLICATION FOR SERVICE

A party desiring electric service must make application to the Company before commencing the use of the Company's service. The Company reserves the right to require a signed application or written contract for service to be furnished. All applications and contracts for service must be made in the legal name of the party desiring the service. The Company may refuse or terminate service to any applicant for or user of service who fails or refuses to furnish information requested by the Company for the establishment of a service account. Receipt and use of electric service in the absence of application or contract shall constitute the user a customer of the Company subject to its rates, rules, and regulations and said user shall be responsible for payment of all service used.

Subject to its rates, rules, and regulations, the Company will continue to supply electric service until notified by customer to discontinue the service. The customer will be responsible for payment of all service furnished through the date of discontinuance.

1.2 SERVICE CHARGES

A. Service Processing Charge

The Company will assess a \$7.00 processing charge for the initial establishment of service for each customer.

B. Service Reconnection Charge

The Company will charge \$50.00 for reconnecting service that has been disconnected for non-payment ~~through 2022, \$30 in 2023, \$20 in 2024, and \$15 beginning in 2025 to align with Advanced Meter Infrastructure deployment.~~

C. Service Relock Charge

The Company will charge \$100.00 for reconnecting service where the Company has disconnected service for non-payment and subsequently returned to relock the service after it was reconnected without Company authorization.

If any combination of the Company's electric or gas services requested by a customer and furnished by the Company are established or reestablished at the same time and location, only the greater of the corresponding electric or gas utility service charges will apply.

If a customer requests reestablishment of service at a location where the same customer discontinued the same service within the preceding 12 month period, an additional fee will be assessed equal to the sum of the monthly minimum charges applicable during the period service was discontinued. This fee is in addition to the Service Processing Charge indicated above. If the customer requests that the service be physically disconnected and subsequently reconnected within the 12 month period, the Service Reconnection Charge applies rather than the Service Processing Charge.

(Continued on Sheet No. 6-4)

Date Filed: ~~11-03-10~~ 03-24-22 By: ~~Judy M. Pefor~~ Christopher B. Clark Effective Date: 09-01-12
President, ~~and CEO of~~ Northern States Power Company, a Minnesota corporation
Docket No. E002/GR-~~10-97422~~-xxx Order Date: 05-14-12

Clean

SECTION 1 GENERAL SERVICE RULES

1.1 APPLICATION FOR SERVICE

A party desiring electric service must make application to the Company before commencing the use of the Company's service. The Company reserves the right to require a signed application or written contract for service to be furnished. All applications and contracts for service must be made in the legal name of the party desiring the service. The Company may refuse or terminate service to any applicant for or user of service who fails or refuses to furnish information requested by the Company for the establishment of a service account. Receipt and use of electric service in the absence of application or contract shall constitute the user a customer of the Company subject to its rates, rules, and regulations and said user shall be responsible for payment of all service used.

Subject to its rates, rules, and regulations, the Company will continue to supply electric service until notified by customer to discontinue the service. The customer will be responsible for payment of all service furnished through the date of discontinuance.

1.2 SERVICE CHARGES

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B. Service Reconnection Charge

The Company will charge \$50.00 for reconnecting service that has been disconnected for non-payment through 2022, \$30 in 2023, \$20 in 2024, and \$15 beginning in 2025 to align with Advanced Meter Infrastructure deployment.

C. Service Relock Charge

The Company will charge \$100.00 for reconnecting service where the Company has disconnected service for non-payment and subsequently returned to relock the service after it was reconnected without Company authorization.

If any combination of the Company's electric or gas services requested by a customer and furnished by the Company are established or reestablished at the same time and location, only the greater of the corresponding electric or gas utility service charges will apply.

If a customer requests reestablishment of service at a location where the same customer discontinued the same service within the preceding 12 month period, an additional fee will be assessed equal to the sum of the monthly minimum charges applicable during the period service was discontinued. This fee is in addition to the Service Processing Charge indicated above. If the customer requests that the service be physically disconnected and subsequently reconnected within the 12 month period, the Service Reconnection Charge applies rather than the Service Processing Charge.

(Continued on Sheet No. 6-4)

Date Filed: 03-24-22

By: Christopher B. Clark

Effective Date:

President, Northern States Power Company, a Minnesota corporation

Docket No. E002/GR-22-xxx

Order Date:

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Redline

**MANUAL METER READING SERVICE RIDER
(AMI OPT-OUT OPTION)**

Section No. 5
~~1st Revised~~Original Sheet No. 148

AVAILABILITY

Available as an option to Residential Service, Residential Time of Day, Small General Service and Small General Time of Day Service customers who elect on-site meter reading service to opt out of energy usage measurements by standard advanced meters with two-way communication capabilities.

RATE

Fixed Charge per Month	\$15.00
Non-Standard Meter Installation Charge	\$40.00
Non-Standard Meter Removal Charge	\$40.00

TERMS AND CONDITIONS OF SERVICE

1. Customers who elect to receive this service will be subject to the Non-Standard Meter Installation Charge upon request for this service.
2. A one-time waiver of the Non-Standard Meter Installation Charge will apply to customers who elect this service prior to the installation of a standard advanced meter at their premise(s) as part of the Company's implementation of Advanced Metering Infrastructure.
3. Customers who cancel this service or vacate the premise where the service was requested will be subject to the Non-Standard Meter Removal Charge.
4. This rider will separately apply to each individual non-standard meter the customer requests be read manually.
5. The Company reserves the right to refuse availability of this rider if the:
 - a. Manual meter reading service would create a safety hazard for the customer, the public, or Company's personnel or facilities,
 - b. Customer does not allow the Company's employees or agents access to the non-standard meter(s) at the customer's premise(s), or
 - c. Customer has a history of meter tampering.
6. Entities such as multi-unit dwelling associations are not authorized to elect this rider on behalf of individually metered customers.
7. Customers electing manual meter reading with this rider may receive bills based on estimated meter readings in any month where circumstances prevent a meter reading.
- 7-8. Customers electing manual meter reading with the rider will be subject to a higher Service Reconnection Charge as specified in the Section 1.2 of the GENERAL SERVICE RULES.

Date Filed:	07-10-2005-20-22	By: Christopher B. Clark	Effective Date:	08-20-21
Docket No.	E002/ M-20-592GR-22-xxx	President, Northern States Power Company, a Minnesota Corporation	Order Date:	07-21-21

SECTION 1 GENERAL SERVICE RULES

1.1 APPLICATION FOR SERVICE

A party desiring electric service must make application to the Company before commencing the use of the Company's service. The Company reserves the right to require a signed application or written contract for service to be furnished. All applications and contracts for service must be made in the legal name of the party desiring the service. The Company may refuse or terminate service to any applicant for or user of service who fails or refuses to furnish information requested by the Company for the establishment of a service account. Receipt and use of electric service in the absence of application or contract shall constitute the user a customer of the Company subject to its rates, rules, and regulations and said user shall be responsible for payment of all service used.

Subject to its rates, rules, and regulations, the Company will continue to supply electric service until notified by customer to discontinue the service. The customer will be responsible for payment of all service furnished through the date of discontinuance.

1.2 SERVICE CHARGES

A. Service Processing Charge

The Company will assess a \$7.00 processing charge for the initial establishment of service for each customer.

B. Service Reconnection Charge

The Company charges a fee to reconnect service that has been disconnected for non-payment. The fee amount is amount is based on whether the meter installed at the customer premise is equipped with an internal service switch, and will be phased-in as follows:

- All customers through December 31, 2022: \$50

Effective January 1, 2023:

- Residential customers with a standard AMI meter: \$15
- Residential customers opting for Manual Meter Reading Service: \$50
- Commercial customers on Small General Service and Small General Time of Day rates with a standard AMI meter: \$15
- Commercial customers opting for Manual Meter Reading Service: \$50
- All other customers: \$50

Effective January 1, 2025:

- Residential customers with a standard AMI meter: \$15
- Residential customers opting for Manual Meter Reading Service: \$95
- Commercial customers on Small General Service and Small General Time of Day rates with a standard AMI meter: \$15
- Commercial customers opting for Manual Meter Reading Service: \$95
- All other customers: \$95

~~B-C.~~ Service Relock Charge

The Company will charge ~~\$400~~^{\$95.00} for reconnecting service where the Company has disconnected service for non-payment and subsequently returned to relock the service after it was reconnected without Company authorization.

If any combination of the Company's electric or gas services requested by a customer and furnished by the Company are established or reestablished at the same time and location, only the greater of the corresponding electric or gas utility service charges will apply.

If a customer requests reestablishment of service at a location where the same customer discontinued the same service within the preceding 12 month period, an additional fee will be assessed equal to the sum of the monthly minimum charges applicable during the period service was discontinued. This fee is in addition to the Service Processing Charge indicated above. If the customer requests that the service be physically disconnected and subsequently reconnected within the 12 month period, the Service Reconnection Charge applies rather than the Service Processing Charge.

(Continued on Sheet No. 6-4)

Date Filed: ~~11-03-10~~ ⁰⁵⁻²⁰⁻²² By: ~~Judy M. Pofar~~ ^{Christopher B. Clark} Effective Date: ~~09-01-12~~
President, ~~and CEO of~~ Northern States Power Company, a Minnesota corporation
Docket No. E002/GR-~~10-97422-xxx~~ Order Date: ~~05-14-12~~

Clean

**MANUAL METER READING SERVICE RIDER
(AMI OPT-OUT OPTION)**

Section No. 5
1st Revised Sheet No. 148

AVAILABILITY

Available as an option to Residential Service, Residential Time of Day, Small General Service and Small General Time of Day Service customers who elect on-site meter reading service to opt out of energy usage measurements by standard advanced meters with two-way communication capabilities.

RATE

Fixed Charge per Month	\$15.00
Non-Standard Meter Installation Charge	\$40.00
Non-Standard Meter Removal Charge	\$40.00

TERMS AND CONDITIONS OF SERVICE

1. Customers who elect to receive this service will be subject to the Non-Standard Meter Installation Charge upon request for this service.
2. A one-time waiver of the Non-Standard Meter Installation Charge will apply to customers who elect this service prior to the installation of a standard advanced meter at their premise(s) as part of the Company's implementation of Advanced Metering Infrastructure.
3. Customers who cancel this service or vacate the premise where the service was requested will be subject to the Non-Standard Meter Removal Charge.
4. This rider will separately apply to each individual non-standard meter the customer requests be read manually.
5. The Company reserves the right to refuse availability of this rider if the:
 - a. Manual meter reading service would create a safety hazard for the customer, the public, or Company's personnel or facilities,
 - b. Customer does not allow the Company's employees or agents access to the non-standard meter(s) at the customer's premise(s), or
 - c. Customer has a history of meter tampering.
6. Entities such as multi-unit dwelling associations are not authorized to elect this rider on behalf of individually metered customers.
7. Customers electing manual meter reading with this rider may receive bills based on estimated meter readings in any month where circumstances prevent a meter reading.
8. Customers electing manual meter reading with the rider will be subject to a higher Service Reconnection Charge as specified in the Section 1.2 of the GENERAL SERVICE RULES.

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SECTION 1 GENERAL SERVICE RULES

1.1 APPLICATION FOR SERVICE

A party desiring electric service must make application to the Company before commencing the use of the Company's service. The Company reserves the right to require a signed application or written contract for service to be furnished. All applications and contracts for service must be made in the legal name of the party desiring the service. The Company may refuse or terminate service to any applicant for or user of service who fails or refuses to furnish information requested by the Company for the establishment of a service account. Receipt and use of electric service in the absence of application or contract shall constitute the user a customer of the Company subject to its rates, rules, and regulations and said user shall be responsible for payment of all service used.

Subject to its rates, rules, and regulations, the Company will continue to supply electric service until notified by customer to discontinue the service. The customer will be responsible for payment of all service furnished through the date of discontinuance.

1.2 SERVICE CHARGES

A. Service Processing Charge

The Company will assess a \$7.00 processing charge for the initial establishment of service for each customer.

B. Service Reconnection Charge

The Company charges a fee to reconnect service that has been disconnected for non-payment. The fee amount is based on whether the meter installed at the customer premise is equipped with an internal service switch, and will be phased-in as follows:

- All customers through December 31, 2022: \$50

Effective January 1, 2023:

- Residential customers with a standard AMI meter: \$15
- Residential customers opting for Manual Meter Reading Service: \$50
- Commercial customers on Small General Service and Small General Time of Day rates with a standard AMI meter: \$15
- Commercial customers opting for Manual Meter Reading Service: \$50
- All other customers: \$50

Effective January 1, 2025:

- Residential customers with a standard AMI meter: \$15
- Residential customers opting for Manual Meter Reading Service: \$95
- Commercial customers on Small General Service and Small General Time of Day rates with a standard AMI meter: \$15
- Commercial customers opting for Manual Meter Reading Service: \$95
- All other customers: \$95

C. Service Relock Charge

The Company will charge \$95.00 for reconnecting service where the Company has disconnected service for non-payment and subsequently returned to relock the service after it was reconnected without Company authorization.

If any combination of the Company's electric or gas services requested by a customer and furnished by the Company are established or reestablished at the same time and location, only the greater of the corresponding electric or gas utility service charges will apply.

If a customer requests reestablishment of service at a location where the same customer discontinued the same service within the preceding 12 month period, an additional fee will be assessed equal to the sum of the monthly minimum charges applicable during the period service was discontinued. This fee is in addition to the Service Processing Charge indicated above. If the customer requests that the service be physically disconnected and subsequently reconnected within the 12 month period, the Service Reconnection Charge applies rather than the Service Processing Charge.

(Continued on Sheet No. 6-4)

Date Filed: 05-20-22

By: Christopher B. Clark

Effective Date:

President, Northern States Power Company, a Minnesota corporation

Docket No. E002/GR-22-xxx

Order Date:

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Average Cost per Remote Disconnect/Reconnect*

1	Pre Lock Call Cost	\$0.53
2	Post Lock Call Cost	\$3.74
3	Field Personnel Costs - Disconnects = Per Trip	\$10.75
4	Field Personnel Costs - Reconnects - Per Trip	\$1.08
*All costs include labor and benefits		
	Total Cost [1+2+3+4]	\$16.10

Average Cost per Remote Disconnect/Reconnect*

1	Pre Lock Call Cost	\$0.53
2	Post Lock Call Cost	\$3.74
3	Field Personnel Costs - Disconnects - Per Trip	\$59.75
4	Field Personnel Costs - Reconnects - Per Trip	\$35.85
*All costs include labor and benefits		
	Total Cost [1+2+3+4]	\$99.87

CERTIFICATE OF SERVICE

I, Christine Schwartz, 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

xx electronic filing

DOCKET NO. E002/M-22_____
Miscellaneous Electric Service List

Dated this 20th day of May, 2022

/s/

Christine Schwartz, Regulatory Administrator

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Alison C	Archer	aarcher@misoenergy.org	MISO	2985 Ames Crossing Rd Eagan, MN 55121	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
James J.	Bertrand	james.bertrand@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd. St, Louis, MO 63119-2044	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
Riley	Conlin	riley.conlin@stoel.com	Stoel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
Brooke	Cooper	bcooper@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174 Lake Elmo, MN 55042	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
Christopher	Droske	christopher.droske@minneapolismn.gov	City of Minneapolis	661 5th Ave N Minneapolis, MN 55405	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance	2720 E. 22nd St Institute for Local Self-Reliance Minneapolis, MN 55406	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Edward	Garvey	edward.garvey@AESLconsulting.com	AESL Consulting	32 Lawton St Saint Paul, MN 55102-2617	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.	445 Etna Street Ste. 61 St. Paul, MN 55106	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2950 Yellowtail Ave. Marathon, FL 33050	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
Thomas	Koehler	TGK@IBEW160.org	Local Union #160, IBEW	2909 Anthony Ln St Anthony Village, MN 55418-3238	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
Kavita	Maini	kmains@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Stacy	Miller	stacy.miller@minneapolisn.gov	City of Minneapolis	350 S. 5th Street Room M 301 Minneapolis, MN 55415	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
Carol A.	Overland	overland@legalectric.org	Legalelectric - Overland Law Office	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206 St. Paul, MN 551011667	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Byron E.	Starns	byron.starns@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
James M	Strommen	jstrommen@kennedy- graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
Lynnette	Sweet	Regulatory.records@xcel energy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
Thomas	Tynes	jjazynka@energyfreedomc oalition.com	Energy Freedom Coalition of America	101 Constitution Ave NW Ste 525 East Washington, DC 20001	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
Lisa	Veith	lisa.veith@ci.stpaul.mn.us	City of St. Paul	400 City Hall and Courthouse 15 West Kellogg Blvd. St. Paul, MN 55102	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine	225 South Sixth Street, Suite 3500 Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
Patrick	Zomer	Pat.Zomer@lawmoss.com	Moss & Barnett PA	150 S 5th St #1200 Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric