414 Nicollet Mall
Minneapolis, MN 55401

June 3, 2025

—Via Electronic Filing—

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

RE: REPLY COMMENTS
IN THE MATTER OF NORTHERN STATES POWER COMPANY D/B/A XCEL ENERGY'S 2024 ANNUAL SAFETY, RELIABILITY, AND SERVICE QUALITY REPORT
DOCKET NO. E002/M-25-27

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits these Reply Comments in response to the initial comments in the above-referenced docket from the Department of Commerce (Department), Office of the Attorney General – Residential Utilities Division (OAG-RUD), and joint comments from Citizens Utility Board, Legal Services Advocacy Project, and Energy CENTS Coalition.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list. Please contact Jemar Lee at Jemar.w.lee@xcelenergy.com or contact me at 612-330-6255 or Nicholas.F.Martin@xcelenergy.com with questions regarding this filing.

Sincerely,

/s/

NICHOLAS MARTIN
DIRECTOR, STRATEGIC OUTREACH AND ADVOCACY

Enclosure
cc: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Hwikwon Ham	Commissioner
Audrey C. Partridge	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

IN THE MATTER OF NORTHERN STATES POWER COMPANY D/B/A XCEL ENERGY'S 2024 ANNUAL SAFETY, RELIABILITY, AND SERVICE QUALITY REPORT	DOCKET NO. E002/M-25-27 **REPLY COMMENTS**

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits these Reply Comments in response to the initial comments in the above-referenced docket from the Department of Commerce (Department), Office of the Attorney General – Residential Utilities Division (OAG-RUD), and joint comments from Citizens Utility Board (CUB), Legal Services Advocacy Project (LSAP), and Energy CENTS Coalition (ECC).

The current "Phase 1" Notice for Comment addresses one component of Xcel Energy's 2024 Annual Report on Safety, Reliability and Service Quality (SRSQ): the plans proposed under Order Points 24 and 32 of the Commission's January 13, 2025 Order in Docket No. E002/M-24-27 to reconnect currently disconnected customers during certain extreme heat-related events, and suspend disconnections and reconnect currently disconnected customers during certain Air Quality Index (AQI) events. Those proposals appear on pages 94-101 of our SRSQ Annual Report and Petition in Docket No. E002/M-25-27. We refer to them in this Reply as our "heat event" and "AQI event" plans.

Since there is significant overlap in the parties' Comments, to reduce duplication we have organized these Reply Comments by topic rather than by party.

I. COMMENTS

A. RATIONALE FOR HEAT EVENT AND AQI EVENT PLANS

The Department provides a summary of research on the need for access to electricity to protect public health during periods of extreme heat and poor air quality. This includes the effects of extreme heat on the body's ability to cool itself, which affects all individuals but particularly those with pre-existing conditions. The Department also addresses the effects of poor air quality, again addressing the general population but highlighting those with greater vulnerability due to chronic lung diseases and chronic obstructive pulmonary disease, as well as the elderly, children, pregnant individuals, and those with greater exposure due to working outdoors. The Department concludes that the "capability through AMI to remotely reconnect involuntarily disconnected customers is a vital tool in avoiding potentially devastating health and safety impacts of poor air quality events and extreme heat."[1] The Minnesota Department of Health (MDH) reinforces these concerns in its late-filed comments, emphasizing the greater impacts of extreme heat and poor air quality on vulnerable Minnesotans.[2] CUB/LSAP/ECC voice a similar rationale, noting that the frequency and severity of extreme heat and poor air quality events appears to be on the rise.[3]

The Company agrees with this rationale, which is the core driver of our heat event and AQI event proposals. We believe the key question before the Commission is not whether Advanced Metering Infrastructure (AMI) can be used in this way, but rather the details of implementation, and how to weigh the benefits to customers who would be reconnected and/or avoid being disconnected, against the costs to all customers of implementing those plans.

B. THRESHOLD TRIGGERING AQI EVENT PLANS

The Minnesota Pollution Control Agency (MPCA) determines the AQI based on hourly measurements of five pollutants (fine particles, ground-level ozone, sulfur dioxide, nitrogen dioxide, and carbon monoxide), and produces daily air quality forecasts for fine particles and ground-level ozone at 18 locations across Minnesota. AQI forecasts heavily depend on temperature, precipitation, wind, and cloud cover, which affect pollution creation and transport from other areas. The AQI is calculated by converting measured pollutant concentrations to a uniform index which is based

[1] Department Comments at 6-7.
[2] Minnesota Department of Health. May 30, 2025 Letter in Docket No. E002/M-25-27.
[3] CUB/LSAP/ECC Comments at 3.

on the health effects associated with a pollutant. The health benchmarks used for calculating the AQI are pollutant-specific and are established by the U.S. Environmental Protection Agency based upon National Ambient Air Quality Standards.[4]

MPCA notes that in recent years, air quality has increasingly been impacted by large wildfires in Canada and the western U.S., and that wildfires are expected to become more frequent and more intense due to climate change, past fire-suppression practices, and populations expanding into wildfire regions.[5] MDH also emphasizes that the frequency and intensity of heat events and of wildfires impacting air quality has increased in recent years, and is expected to continue to increase with climate change.[6] This is an important issue that we discuss further below, since it makes it difficult to predict the how often heat and AQI events will occur, now long they may last, and how many customers the suspension of disconnections and implementation of reconnection may affect.

Order Point 32 of the Commission's Order on this matter states that "Xcel must propose a plan, as part of its 2024 safety, reliability, and service quality report due on April 1, 2025, to restore power for involuntarily disconnected customers with AMI when *high* air quality index alerts have been issued" (italics added).[7]

The Department notes, however – as the Company did in our SRSQ Annual Report – that there is no MPCA-issued AQI level labeled "high." MPCA provides its AQI as:

- Good (green), corresponding to ≤50
- Moderate (yellow), 51-100
- Unhealthy for Sensitive Groups (orange), 101-150
- Unhealthy (red), 151-200
- Very Unhealthy (purple), 201-300
- Hazardous (maroon), >300[8]

Since there is no "high," interpreting Order Point 32 required the Company propose thresholds for suspending disconnection and implementing reconnection that are in

[4] See Understanding the air quality index (AQI) | Minnesota Pollution Control Agency.
[5] *Ibid.*
[6] MDH Letter at 3-4.
[7] January 13, 2025 *Order In the Matter of Xcel Energy's 2023 Annual Safety, Reliability and Service Quality Report.* Docket No. E-002/M-24-27. Order Point 32.
[8] See Understanding the air quality index (AQI) | Minnesota Pollution Control Agency for general information, and Current air quality conditions | Minnesota Pollution Control Agency for the current conditions. See also AQI Basics | AirNow.gov, cited in OAG-RUD Comments at 3.

our judgment consistent with Commission intent, protective of public health, and appropriately balance benefits and costs. The choice of any threshold involves weighing the benefits to customers receiving the new protections against costs to other customers, since the lower the threshold chosen, the more events per year and total days per year that disconnections will be suspended and previously disconnected customers will be reconnected, and the higher the overall annual costs incurred. Moreover – assuming that at least some portion of the cost of providing electricity to the customers not disconnected and/or reconnected is not ultimately recovered from those customers – the more AQI events and total days, the greater the increase to bad debt. Both the annual costs and increased bad debt would translate into higher costs to all customers in a subsequent rate case. We considered those costs and benefits, along with the fact that the Company already provides medical protections that allow vulnerable customers who depend on electricity for medical equipment to avoid disconnection.[9] We proposed to suspend disconnection of affected customers with AMI meters when the AQI is 151 or greater (Unhealthy), and to commence reconnection of affected customers with AMI meters when the AQI is 201 or greater (Very Unhealthy).[10]

All three commenters speak to this question. In their initial comments, the Department does not provide a recommended AQI threshold, but proposes further consultation with MPCA and MDH to explore the public health implications of different thresholds.[11] However in additional comments filed on June 3, 2025, the Department revises this recommendation, concluding that "an AQI of 151 is a reasonable threshold to qualify as 'high' as ordered in the Commission's 2023 SRSQ Order," and recommending that the Company implement both suspension of disconnection and reconnection at AQI ≥151. The Department however continues to recommend additional consultation with MPCA and MDH "toward a permanent AQI threshold at which to initiate reconnections and suspend disconnections," as well as to "establish common terminology and definitions regarding poor air quality and extreme heat, establish appropriate thresholds related to poor air quality, extreme heat; and revise its proposals based on those determinations."[12] So the Department appears to be recommending moving forward now with AQI ≥151 as an interim threshold, but continuing to discuss what the AQI threshold should be in the long term.

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[9] See Medically Necessary Equipment & Emergency Certification Form.pdf.

[10] Northern States Power Company, doing business as Xcel Energy. ANNUAL REPORT AND PETITION. *In the Matter of Northern States Power Company's Annual Report on Safety, Reliability, and Service Quality for 2024; and Petition for Approval of Electric Reliability Standards for 2025*. Docket No. E002/M-25-27. Part III, page 96.

[11] Department Comments at 5.

[12] Department's June 3, 2025 Comments at 5.

CUB/LSAP/ECC and OAG-RUD propose that both suspending disconnections and beginning reconnections should begin at the AQI level of 151 (Unhealthy). CUB/LSAP/ECC note that since 2021, only five days have reached the Very Unhealthy threshold of 201, whereas 25 days exceeded 150. They are concerned that implementing reconnections only when the AQI reaches 201 would result in few customers receiving this protection. They also argue that an AQI of 151 or higher is associated with harmful health effects, which are more severe for sensitive populations.[13,14]

As noted in our response to the Department's Information Request No. 5 in this docket, when developing our AQI event plan the Company incorrectly interpreted data from the MPCA's website to indicate that there were five Very Unhealthy (≥201) days in 2023, and estimated costs on that basis. The 2023 data in fact indicates there were five Unhealthy (≥151) days but no Very Unhealthy days in 2023.

Considering this, the Company is willing to revise our proposal and use an AQI threshold of ≥151 for both suspending disconnections and reconnecting disconnected customers, if the Commission believes this reflects the appropriate weighing of benefits and costs for our customers. We note that vulnerable customers have an existing mechanism – the Company's Medically Necessary Equipment & Emergency Certification Form[15] – to avoid being disconnected. We acknowledge, however, that a general policy of suspending disconnections and reconnecting customers at AQI ≥151 would reach customers who may not avail themselves of this form.

An AQI threshold of ≥151 will mean more AQI events and more total days per year when disconnections are suspended and disconnected customers are reconnected, which will translate into higher annual costs and bad debt impacts borne by all customers. In addition, the relatively small number of AQI ≥151 days in past years may not predict future frequency. AQI events may or may not coincide with heat advisories or excessive heat warnings issued by the National Weather Service (NWS), since poor air quality can occur on very hot days but can also occur due conditions (e.g. a wildfire in Canada or the western U.S.) not coinciding with hot weather in Minnesota. As such, the number of events and total number of days when the Company would suspend disconnections and reconnect customers due to extreme heat and/or AQI ≥151 is extremely difficult to forecast, but could well be more than the numbers suggested by historical data. For this reason, the Company has only

[13] CUB/LSAP/ECC Comments at 4.
[14] OAG-RUD Comments at 3-6, 21.
[15] See Medically Necessary Equipment & Emergency Certification Form.pdf.

attempted to estimate costs per event, not the total number of events in future years.

It is also likely, if the Commission approves the heat event and AQI event reconnection plans and orders a threshold of AQI ≥151 for reconnection, that customer complaints will increase after each event, when reconnected customers are again disconnected as the NWS heat event is lifted or the AQI falls below 151. This is because customers are today unfamiliar with the practice of being reconnected and then re-disconnected for heat and AQI events, so re-disconnection is likely to lead to a new round of complaints. This is one of many reasons the Company has advocated for an updating of the Customer Complaints standard in our Quality of Service Plan (QSP) Tariff docket.[16]

C. FURTHER RECORD DEVELOPMENT

The Department, while emphasizing the importance of health concerns related to extreme heat and poor air quality and the potential benefits of using AMI to restore power to disconnected customers during those events, recommends that the Commission deny the Company's heat event and AQI event proposals and provide time for additional record development. In particular, the Department recommends the Company consult with the MPCA and MDH to establish common terminology and definitions regarding extreme heat and poor air quality, and to establish appropriate heat and AQI thresholds for each action.[17]

In additional comments filed on June 3, however, the Department revises this position, recommending that the Commission require the Company to implement the heat and AQI event plans – and suggesting that the additional record development and consultation with MPCA and MDH should be only "toward a permanent AQI threshold", not delaying moving forward at this time.[18]

MDH supports further consultation and development of the record "to establish terminology and definitions regarding extreme heat and poor air quality, and appropriate thresholds for initiating electrical power reconnections and suspending disconnections."[19]

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[16] Northern States Power Company, doing business as Xcel Energy. May 15, 2025. 2024 ANNUAL REPORT AND TARIFF MODIFICATION REQUEST. In the Matter of Northern States Power Company's 2024 Annual Report on Quality of Service Plan (QSP) Tariff. Docket Nos. E,G002/CI-02-2034 AND E,G002/M-12-383.
[17] Comments of the Department of Commerce (hereafter "Department Comments"). *In the Matter of Northern States Power Company d/b/a Xcel Energy's Electric 2024 Annual Safety, Reliability, and Service Quality Report*. Docket No. E-002/M-25-27. Pages 3-5, 7.
[18] Department's June 3, 2025 Comments at 5.
[19] MDH Letter at 3.

The Company has no objection to further consultation with MPCA and MDH, if the Commission believes the record is not yet sufficient for a decision. However, since the Company is now willing to both implement suspension of disconnection and reconnection at the AQI threshold of ≥151 – if the Commission determines this to be prudent – then further consultation with MPCA and MDH may not be necessary. We note that delaying a Commission decision would delay the start of the implementation timeframe discussed in section E.

CUB/LSAP/ECC and OAG-RUD appear to favor moving forward with a Commission decision rather than further record development. They generally support moving forward on the Company's heat event and AQI event plans, but with proposed modifications and on a faster timeframe than the Company proposed.

D. CUSTOMER OUTREACH AND NOTIFICATIONS

The Department discusses two types of customer notification: 1) a general notification to all customers of the policy change if the Commission directs the Company to institute these new policies, and 2) notification to affected customers that reconnection due to a heat event or AQI event is about to take place. For policy changes, the Department recommends the Commission require the Company to notify customers via a bill insert or email, according to their bill delivery preference. For actual events, the Department recommends the Commission require the Company to notify affected customers of a pending reconnection via a notification sent via the customer's preferred contact method (e.g. text, email).[20] The Company has no objection to these proposed notification methods.

CUB/LSAP/ECC propose significantly more extensive customer notifications. For the policy change, they recommend that the Company submit a compliance filing within 60 days of the Commission's Order describing an outreach and communications plan to educate customers about the new heat event and AQI event plans. They propose that this outreach and communications plan should include community engagement, annual notices, bill inserts, website revisions, direct customer contact, information provided in multiple languages, and outreach materials distributed through channels trusted by underserved communities such as community groups, nonprofits, affordability program providers, and state agencies. They also propose the Company should include on its website an overview of extreme heat and air quality protections, and the steps customers must take to secure reconnection of service.[21]

[20] Department Comments at 5.
[21] CUB/LSAP/ECC Comments at 5.

The Company does not object to developing communications, including posting information to our website about the heat event and AQI event plans and providing bill insert/onserts. We note that any new communications would impose costs that are additional to the cost estimates provided in our 2024 SRSQ Annual Report. Those costs include:

- Cost per bill insert: $37,000, plus postage
- Cost per bill onsert: $0.02347/onsert
- Additional staff time for coordination with community-based organizations and participation in community events
- Translation costs
- Printing costs for materials distributed at community events

As for notifications to affected customers when reconnection due to a heat or AQI event is about to occur, CUB/LSAP/ECC propose that in addition to contacting such customers via phone, the Company should be required to use a second form of communication – text or email – when the customer has granted consent to do so.[22] The Company can commit to contacting customers regarding a pending reconnection via their preferred notification route, and we will also commit to contacting customers via a secondary, alternate method if we have one on file. We again note that this will impose costs additional to the cost estimates provided in our 2024 SRSQ Annual Report. Those include approximately $0.025 per text and $0.10 per email. The number of texts and/or emails will be dependent on the number of heat and AQI events, and the number of customers in a disconnected status at the time a heat or AQI event occurs, as discussed further in section F below.

A separate issue from how the Company notifies affected customers is how we hear back from them before reconnection. OAG-RUD appears to acknowledge the need for safety reasons to receive an acknowledgement from the affected customers that their breakers are off and they are ready for power to be restored. OAG-RUD questions why the Company proposes a call back rather than other methods (email, text, MyAccount, or some other automated process) for customer acknowledgement. In addition, OAG-RUD requests further explanation how the need to hear back from disconnected customers prior to reconnection in a heat or AQI event differs from reconnection after a power outage, or reconnection when a disconnected customer enters into a payment plan to restore service.[23]

[22] CUB/LSAP/ECC Comments at 5-6.
[23] OAG-RUD Comments at 7-9.

The fundamental difference is that in the latter two cases, the customer is expecting power to be restored. In the case of reconnection during heat or AQI events, it is likely the customer would be unaware of the heat or AQI event and would not be expecting power to be restored. Even if the Company has sent a bill insert/onsert or email notifying them of the policy change, the customer may not have read it; if they did, they may not be monitoring the National Weather Service for heat events or MPCA's alerts for AQI events. If the customer is unaware, there are conditions in which restoring power could be a serious safety issue. It is crucial that there be an effective mechanism not only to notify customers, but also to hear back from them, before reconnection takes place.

The Company had further discussion on this issue in response to the CUB/LSAP/ECC and OAG-RUD comments. We continue to maintain that it is crucial for safety reasons to provide disconnected customers, especially those with no immediate expectation of reconnection, advance notice prior to re-energization of their homes and appliances. We also feel it is important for customer safety and satisfaction – even if not explicitly required by statute or rule – also to receive acknowledgement from customers that their breakers are off and they are ready for power to be restored. The mechanism for customer acknowledgement will need to be relatively quick, since some heat events and AQI events are brief. After further consideration, we are willing to agree to customer acknowledgement by telephone call or by other means the customer has given consent to – text, email, MyAccount, or Interactive Voice Response (IVR).

Finally, CUB/LSAP/ECC propose that the Company's pre-event communications should inform customers that they will be disconnected again at the conclusion of the event, provide information about how to enter into a payment arrangement to avoid disconnection, and connect them with energy assistance resources. The Company can also agree to this; we take every opportunity to offer payment arrangements and connect our customers to energy assistance and our own affordability programs. To set expectations, however, we note that the customers in question would have been disconnected initially because they did not take the opportunity throughout the Company's nine-week outreach process to enter into a payment arrangement or access energy assistance to avoid disconnection. As such, it may be unrealistic to expect a large proportion of customers to do so following a brief heat or AQI event reconnection.

E. IMPLEMENTATION TIMEFRAME

In its initial comments, the Department does not take a position on the reasonableness of the Company's estimated timeframe from a Commission Order to

implement our heat event and AQI event plans, but recommends that the start date coincide with spring of 2026 or 2027, depending on the time necessary to review the Company's implementation plans in more detail.[24] We do not anticipate being able to implement reconnection plans by spring 2026, for the reasons described below. We may be able to implement suspension of disconnection for AQI events by that time, and reconnection plans by spring 2027, depending on the timing of the Commission's decision.

In additional comments filed June 3, however, the Department revises this position, maintaining that the Company's proposed implementation timeline is unreasonable and that the Company should be ordered to implement its excessive heat and air quality protections, including initiating reconnections and suspending disconnections, by May 1, 2026, at the latest.[25] This is not feasible for reconnections, for the reasons explained later in this section. It may be feasible for suspending disconnections during AQI ≥151 events. (Consistent with Minn. Stat. § 216B.0975, the Company already suspends disconnections of residential services in affected counties when an excessive heat watch, heat advisory, or excessive heat warning issued by NWS is in effect.)

CUB/LSAP/ECC dispute the Company's estimate of 16 months for implementation. They object that the initial direction to prepare a proposal for extreme heat reconnections came in March 2023, and the Company's proposed timeline would result in the new protections becoming available at the start of 2027. They propose that the Company be required to implement reconnection in extreme heat and AQI events no later than May 1, 2026.[26]

Similarly, OAG-RUD maintains that the Company should be ordered to explain more fully its 16-month time estimate, or else to implement more quickly. They add that:

> *It has been over two years since the Commission first ordered Xcel to present a proposal to reconnect customers during periods of extreme heat. Yet Xcel's filing provides few justifications for its estimate of 72 weeks (or 16 months), after the issuance of the Commission's order, to institute these practices… Under Xcel's timeline, it appears likely that it will not have the plan in place until heat-advisory and air-quality events in Summer 2027. This four-year delay following the Commission's initial order, at best, appears to be a lack of prioritization by Xcel, and at worst, foot dragging.*

[24] Department Comments at 5.
[25] Department's June 3, 2025 Comments at 6.
[26] CUB/LSAP/ECC Comments at 6.

The Company strongly objects to this characterization. While we proposed a preliminary version of these plans in our 2023 SRSQ annual report, and a detailed version in our 2024 annual report, the Commission has not yet reached a decision on whether the Company should implement these plans. To refer to the time since March 2023 and allege "foot dragging" is to imply that the Company should have been spending staff time and our customers' money to develop these heat event and AQI event plans without Commission approval to do so. The Company does not incur significant costs for our customers without the Commission's direction. We will begin spending resources to implement the heat and AQI plans only once the Commission has issued Orders to do so.

More reasonably, OAG-RUD requests more detail on the 16-month program development timeframe, the steps that need to be taken, and whether some steps can be implemented concurrently.[27] We derived this estimate based on two functions required to make this process successful and available to customers:

- In Phase 1, or the "supporting infrastructure" phase, the Company would implement the Interactive Voice Response (IVR) modifications that will be required to serve these customers successfully. Without IVR modifications, the additional customer contacts needed to implement reconnections during heat and AQI events would cause strain on other customers by driving up call wait times, and/or impose additional costs to hire more agents to answer these additional calls without IVR call handling. To implement IVR for heat and AQI event plans, there will need to be two system releases. The first process change would occur in the general customer billing and data management systems, creating an option to allow customers disconnected for non-payment to show a billing system code defining them as a customer eligible for reconnection using AMI. This requires technology updates to build that capacity, capture this field for the customer's records, and then disconnect the customer post-event without impacting other customers who have the same status but are not a part of this event type. The Company would have to modify our customer billing and data management systems to process the reconnected customers without driving other customer processes into overload status or requiring expensive and manual customer field personnel visits to facilitate. Phase 1 would take roughly four months to design, procure support for, and deploy to the systems.

[27] OAG-RUD Comments at 20.

- Phase 2 would involve rewriting IVR call flows to either direct the call to agents who are knowledgeable, or allow the customer to self-serve by recording a required message that we may safely reconnect their power. This phase will require a bid out to the IVR vendor, development, and internal user acceptance testing (UAT), which is the phase of testing required to demonstrate that designed modifications are working in current systems as demonstrated by actual test cases completed by users of those systems. In addition to UAT, this phase will include agent training, communications, and agent updates, and finally deployment. Phase 2 would take three months from start to finish to complete.

Before Phases 1 and 2 can begin, a pending IVR upgrade must be completed to better support customers using that communication channel. This upgrade is currently in the final phase of deployment, with cut-over anticipated by July 4, 2025. Following cut-over, we have a minimum of ten months of scheduled work that must be conducted to best and most efficiently serve our customers; that work will have to precede this change, due to other regulatory agreements.

We provide here a refined timeline by step, per OAG-RUD's request:

- 10 months to upgrade the current IVR and complete pending/required releases
- 4 months for Phase 1
- 3 months to Phase 2
- 1 month of agent rollout/training and business/customer education

These steps cannot be completed concurrently, since one builds the foundation for the next. In all, we estimate at minimum 18 months to complete a viable and safe customer product that accounts for all current requirements of the Commission for IVR and agent call handling. If the Company is able to implement any of the above steps more quickly than currently projected, we will do so.

Finally, CUB/LSAP/ECC urge the Commission to separate the timeframe for suspension of disconnection from that of reconnection, and require the Company to begin immediately suspending disconnections when the AQI is 151 or higher.[28] CUB/LSAP/ECC are correct that suspension of disconnection is less complex than reconnection, since it does not involve some of the system enhancements and notification protocols discussed above for reconnection. Implementation is not, however, instantaneous. For suspension of disconnection for AQI, the Company

[28] CUB/LSAP/ECC Comments at 6.

would need time to set up systems for monitoring AQI, integrate the geographic scope of AQI alerts (counties and metropolitan areas) into our internal systems in order to identify the customers otherwise eligible for disconnection whose disconnection should be suspended, train staff, and institute monitoring protocols so that we are able to collect the data CUB/LSAP/ECC recommend for reporting. We believe suspension of disconnection when the AQI is 151 or higher could be put in place by spring of 2026, if the Commission would like to see this part of the AQI event plan go forward on a separate and quicker timeline than is feasible for AQI event reconnections.

F. ESTIMATED NUMBER OF AFFECTED CUSTOMERS

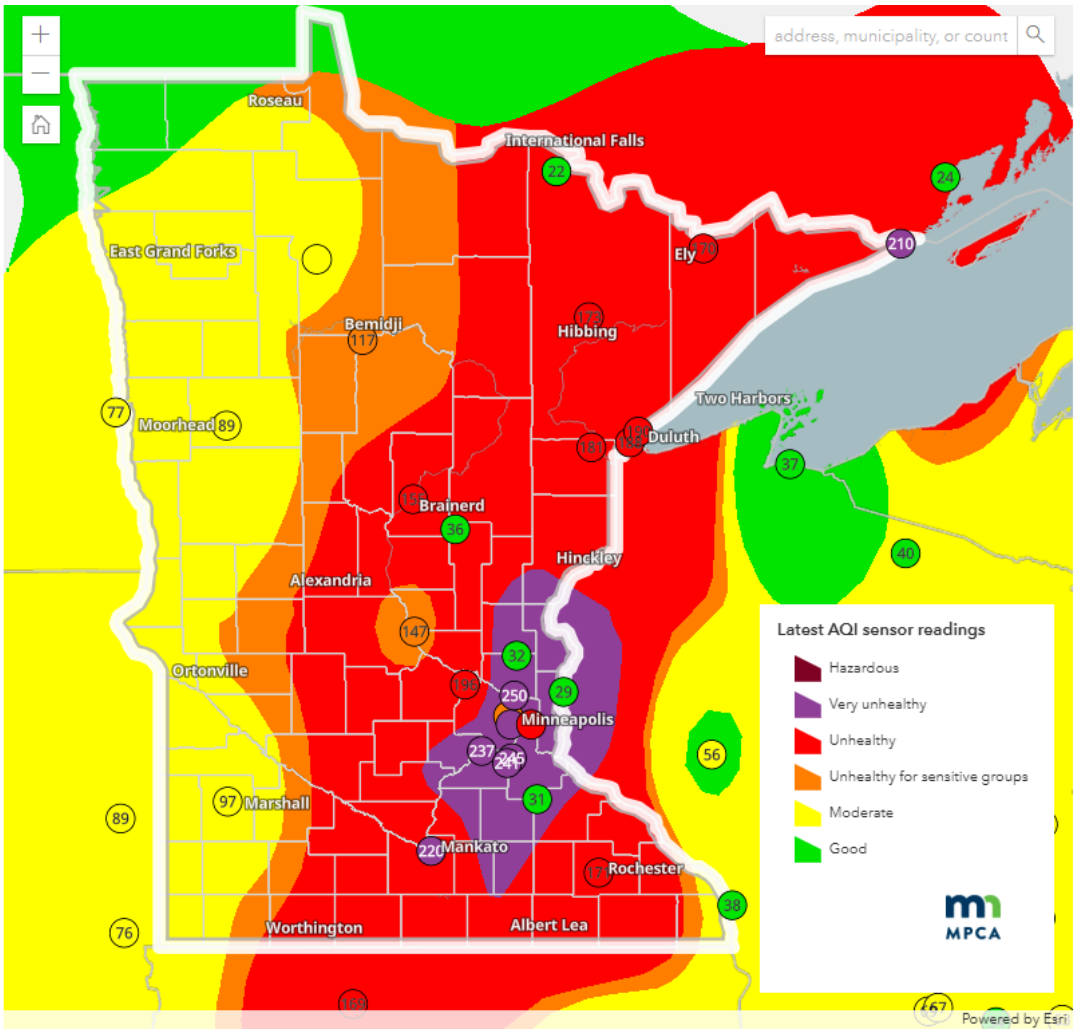
OAG-RUD questions the Company's estimate of 19,000 disconnected customers that could need to be reconnected during a heat or AQI event. They present evidence from the Company's residential customer status reports that a smaller number (about 11,000) were in a disconnected status in July 2024. In addition, OAG-RUD maintains that for AQI events, it is:

> *…unlikely that the full number, whatever that may be, of Xcel's disconnected customers would be contacted for reconnection each event. Xcel's service territory is expansive, while as shown in Figure 2 above, the number of days of events differs widely across the state… Therefore, assuming an air-quality event would be triggered for all of Xcel's disconnected customers, regardless of the county level alerts that Xcel intends to rely on, is a high estimate. While the assumption that Xcel's full service territory would be impacted by a heat-triggered reconnection event is more reasonable, there will likely be times when, for example, Xcel's Moorhead territory differs from the Metro.*[29]

This is not necessarily the case. For example, Figure 1 below shows the status of the AQI on June 3, 2025, the day of filing these Reply Comments. All of Minnesota is in an AQI alert due to wildfire smoke, and the area where the AQI is red (Unhealthy or ≥151) covers a very large portion of the state, including virtually all of the Company's service territory save a small portion around Fargo/Moorhead. If the AQI event plans were in place today, the Company would be suspending disconnections and reconnecting disconnected customers in virtually our entire service territory. This AQI event does not coincide with any NWS heat advisory or excessive heat warning; in fact, on June 3, the forecast high temperature in Minneapolis is 70 degrees, with rain.

[29] OAG-RUD Comments at 15-16.

Figure 1
Current Air Quality Conditions on June 3, 2025 [30]



The Company acknowledges that we do not know during what months future heat and/or AQI events will take place, what portion of our Minnesota electric service territory they will impact, or the number of customers who will be in a currently disconnected status at the times of year and parts of our service territory those events impact. While extreme heat events are somewhat predictable, they are becoming more variable; AQI events are difficult to forecast, can occur at various times of year, and may not coincide with heat events, contrary to OAG-RUD's assertion.[31] With climate change, both types of events are becoming more difficult to predict.

[30] Per Current air quality conditions | Minnesota Pollution Control Agency.
[31] OAG-RUD Comments at 18: "The number of disconnected customers in June through August, which are the months when a reconnection event is most likely to occur."

In short, there are multiple and irreducible uncertainties in making these forecasts. The Company lacks climate and wildfire modeling expertise to make forecasts of how often, for how long, and what parts of our service territory future extreme heat and/or AQI events may impact. While climate and wildfire models are improving, they generally provide predictions with wide error bars and for regions much larger than the Company's Minnesota service territory. In addition, to the Company's knowledge, no other utilities in the United States are currently implementing heat and/or AQI reconnection, so we lack comparative data from other utilities and regions to inform our predictions and cost estimates.

Moreover, the number of customers disconnected by month (as reported in our SRSQ Annual Reports) only reflects the number of customers of record *newly* disconnected that month. The total number of customers of record in a disconnected status would include both customers newly disconnected that month and customers disconnected in a prior month and remaining disconnected in the current month. The number of customers reconnected during a heat or AQI event would include all customers in a disconnected status (who were disconnected using our Remote Connect/Disconnect technology) at the time the heat or AQI event occurs.

In view of these uncertainties, in our 2024 SRSQ Annual Report the Company used 19,000 as an estimate of the number of residential and commercial customers the Company might need to reconnect in a future year. Our goal was to be conservative for cost estimation purposes – emphasizing that at this stage the Company is only doing its best to inform a Commission decision on whether to move forward with these plans, not seeking a Commission determination on actual costs and the reasonableness of those costs. Recovery will take place in a future proceeding and will be based on the actual number of customers reconnected and whose disconnection is suspended, and the actual costs incurred. The Commission need not make any cost recovery decision now based on preliminary estimates of affected customers or costs.

However, the Department and OAG-RUD raised questions about the estimate of 19,000 affected customers, perhaps reading that number as suggesting a level of precision the Company did not intend. We provide here a new approach, including a range of estimates to better reflect the uncertainties in this prediction.

1. New Method: Range of Potentially Affected Customers

As a low-end estimate of the number of potentially affected customers, we use the lowest number of customers of record in a disconnected status in a non-Cold Weather Rule (CWR) month in 2024. This includes customers newly disconnected that month and customers remaining disconnected from prior months. This occurred

in May 2024, when 4,479 residential and commercial customers of record were in a disconnected status on May 1. A heat or AQI event occurring at such time would have the lowest cost impact on other customers.

As a mid-range estimate, we use the highest number of customers of record in a disconnected status in a non-CWR month in 2024. This includes customers newly disconnected that month and customers remaining disconnected from prior months. This occurred in July 2024, when 12,453 residential and commercial customers were in a disconnected status on July 18.

For a high-end estimate, we retain the estimate of 19,000 customers of record used in our SRSQ Annual Report, which includes other groups of disconnected customers not reflected in the low-end and mid-range estimates[32] and takes into consideration the expected roll out of additional AMI meters in 2025. The low-end and mid-range estimates assume that the number of disconnected customers in future years will not be higher than these numbers were in 2024. The high-end estimate accounts for the possibility that it could be higher.

We assume that a future heat or AQI event could occur at any time, since with an increasingly less predictable climate, we are uncertain when these events will occur. AQI events, in particular, could occur at various times of the year and may or may not coincide with heat events. All three estimates also assume that our entire service territory would be affected by a heat or AQI event, as shown in Figure 1. It is possible, as OAG-RUD points out, that heat and/or AQI events may only affect part of Xcel Energy's Minnesota service territory, reducing the number of reconnected customers and the actual costs. However, the Company lacks the climate and wildfire modeling expertise to make a non-arbitrary assumption about the portion affected. Again, we emphasize that we are only providing estimates to inform a Commission decision; if future heat or AQI events affect only part of our service territory and the number of customers reconnected is smaller, the actual costs for which the Company seeks recovery would accordingly be lower.

Table 1 shows the results of this new method using low, mid, and high estimates of affected customers. Note that these do not represent total annual costs, for two reasons. First, the "Per Event Variable Costs" column shows costs that will vary by the number of customers affected, but these are per event – and the Company does not presume to predict the number of heat and AQI events in future years, which may

[32] Including customers with an extended disconnection status, such as seasonal properties, and "unknown user accounts" (also known as "no customer of records accounts"), which are accounts where services have not been set up, where a customer has moved out of a property and not notified the Company, or where someone has moved in and not set up an account with the Company.

be greater than in past years. Second, none of the three estimates includes any attempt to quantify increased bad debt due to costs incurred to provide electricity to the reconnected customers that are not ultimately recovered from those customers. Those costs would be borne by all other customers and recovered in a future rate case. The difficulty predicting bad debt impacts is discussed further in Section G.

Table 1
Estimates of Affected Customers and Associated Costs
(Per Event, not Including Costs of Bad Debt)

Estimate	Number of Customers	Basis	One-Time costs to Set Up System	Per Event Variable Costs
Low-end	4,479	May 1, 2024 (non-CWR month in 2024 with lowest number of residential and commercial customers of record in a disconnected status)	$360,000	$38,608
Mid-range	12,453	July 18, 2024 (non-CWR month in 2024 with highest number of residential and commercial customers of record in a disconnected status)	$360,000	$107,345
High-end	19,000	Conservative estimate assuming a higher number of disconnected customers at time heat/AQI event occurs	$360,000	$163,780

G. COST ESTIMATES

OAG-RUD recommends that the Commission refrain from determining the reasonableness of the Company's cost estimates. Instead, OAG-RUD recommends the Commission require the Company to make a compliance filing within 30 days of the Order with more developed cost estimates, allowing interested persons to review the cost proposals and file an objection within 30 days of the Company's filing.[33] The Department supports this recommendation in its June 3 comments.[34] OAG-RUD also notes that "Further, Xcel has not shown that its estimated costs to set up the [heat and AQI event] procedures are incremental to costs in its pending rate case."[35]

[33] OAG-RUD Comments at 12-13, 21.
[34] Department's June 3, 2025 Comments at 6.
[35] OAG-RUD Comments at 13-14.

First, we can confirm here that our estimates of heat event and AQI event costs are incremental to costs in the Company's pending multiyear rate plan for 2025-2026. We did not include those costs in our rate case, since the Commission has not yet reached a decision on whether the Company should implement these heat and AQI event plans.

Second, the Company has acknowledged that the cost estimates in our 2024 SRSQ Annual Report are preliminary. They do not include reconnection costs per event, nor do they include any estimate of the increase to bad debt due to implementing heat event and AQI event plans. Bad debt impacts will be particularly difficult to forecast, since these would require the Company to estimate at least the following variables, all of which are uncertain and the uncertainties of which compound each other:

1. The frequency of heat events and AQI events in the future, for which the number in the past may not be an adequate guide due to ongoing climate change and wildfire frequency and intensity. This is particularly true because even models that predict climate change impacts for larger regions (e.g. the U.S. Upper Midwest) often struggle to make predictions at the much smaller scale of the Company's Minnesota service territory.
2. The duration of each type of event.
3. The extent to which heat event days and AQI event days will coincide, determining to what extent the two types of events are additive.
4. The number of customers who would otherwise be disconnected during those events that will not be disconnected, and for how long.
5. The number of customers in a currently disconnected status who would be reconnected during those events, and for how long.
6. The proportion of the not-disconnected and reconnected customers who would not ultimately pay the costs of electric service during those events – costs that will become additions to bad debt proposed for recovery in a future rate case.

With less than three months between the Commission's January 13, 2025 Order to prepare these plans and the April 1 due date of our 2024 SRSQ Annual Report, the Company made our best efforts to estimate costs, but those estimates remain preliminary and subject to significant uncertainty.

We oppose the suggestion from OAG-RUD and the Department of a compliance filing within 30 days of the Commission's Order with more developed cost estimates – simply because we will not have any more certainty on the above six variables within

30 days of a Commission Order than we had at the time of our April 1 filing, or have today.

However, the Company is not asking the Commission to make a determination on the reasonableness or prudency of our preliminary cost estimates. We are providing those estimates only to aid in the Commission's weighing of costs versus benefits in implementing the heat event and AQI event plans. If the Commission directs the Company to implement these plans, we expect the Commission will evaluate the reasonableness of our actual costs at a later time, likely in a future rate case or other appropriate docket. That evaluation can be based on actual numbers of affected customers and actual costs.

H. UPDATING TARIFF SHEETS, AND REPORTING

CUB/LSAP/ECC note that the Company's current tariff sheets include the statutory requirement not to disconnect residential customers from service when an excessive heat watch, heat advisory, or excessive heat warning is in effect. They recommend the tariff sheets be updated to include the expanded heat event and AQI event protections, if the Commission orders them.[36] We have no objection to this suggestion.

CUB/LSAP/ECC also propose that the Company track, and report in our SRSQ annual reports, the number of disconnections suspended, number of customers qualifying for reconnection, and the number of reconnections ultimately carried out, both in aggregate and at the county level. If feasible, they recommend the Company include more granular data in its service quality map detailing where these protections are triggered.[37] The Department makes a similar recommendation in its June 3 comments.[38]

We believe this information can be added to our annual report. Adding it to our Xcel Energy Minnesota Service Quality – Electric interactive map[39] would be more challenging, for two reasons. First, many additional data layers were recently added to the map as a result of the Commission's January 13, 2025 Order in Docket No. M-24-27. The more layers added to the map, the more difficult the map becomes to use due to simple bandwidth concerns. Second and more significantly, heat events from the National Weather Service are issued at the county level, and AQI events from MPCA

[36] CUB/LSAP/ECC Comments at 7.
[37] CUB/LSAP/ECC Comments at 7.
[38] Department's June 3, 2025 Comments at 6.-7.
[39] See MN Service Quality - Electric.

are issued either for counties or for a variety of cities and regions.[40] Counties and AQI regions do not correspond to the Census Block Group boundaries that are used on Xcel Energy's interactive map. It may be challenging to map the disconnected and reconnected customers by county, city or region to the Census Block Group data on the map. Neither of these difficulties is insurmountable, but the Commission should weigh whether the added benefit outweighs these disadvantages.

II. CONCLUSION

The Company appreciates this opportunity to respond to the recommendations of the Department, CUB/LSAP/ECC, and OAG-RUD on the Company's heat event and AQI event proposals. All parties are in alignment on the core rationale for using AMI to reconnect previously disconnected customers during extreme heat events, and suspend disconnections and reconnect previously disconnected customers during AQI events. Determining the appropriate threshold at which to implement these plans involves weighing the benefits to customers thus protected against costs to all customers. If the Commission so directs, the Company is willing to implement both suspension of disconnection and reconnection at AQI ≥151 (Unhealthy). We note this may increase costs relative to our estimates, and that with climate change and increased wildfire, the frequency and duration of such events is difficult to forecast but may be greater than in past years. We have made no attempt to predict future frequency or duration. Finally, we note that customer complaints may increase on re-disconnection, which is one of several reasons for an updated Customer Complaints standard as proposed in the Company's Quality of Service Plan (QSP) annual report.[41]

The Company agrees to implement customer outreach and notifications, both for general awareness of the new policies, and for notification of impending heat and AQI events. This will impose some added costs. For reconnection during such events, it is crucial for safety reasons that disconnected customers are aware in advance that their power will be restored, and have acknowledged that their breakers are off and they are prepared for reconnection. On further consideration, we are willing to receive this customer acknowledgement via various channels per the customer's preference.

The Company has estimated a timeframe of at least 16 months from a Commission Order to implement our heat and AQI event plans. We maintain that estimate here, and provide further detail on the steps involved. If the Commission wishes to separate the implementation of suspension of disconnections during an AQI event

[40] See Current air quality conditions | Minnesota Pollution Control Agency.

[41] Northern States Power Company, doing business as Xcel Energy. May 15, 2025. 2024 ANNUAL REPORT AND TARIFF MODIFICATION REQUEST. In the Matter of Northern States Power Company's 2024 Annual Report on Quality of Service Plan (QSP) Tariff. Docket Nos. E,G002/CI-02-2034 AND E,G002/M-12-383.

from reconnection during a heat or AQI event, we believe that suspension of disconnections could be implemented more quickly, by spring of 2026.

Regarding the number of customers who might be reconnected in a heat or AQI event, the Company in our original filing made a preliminary estimate of 19,000. Responsive to questions raised by parties, we here replace that single estimate with low-end, mid-range, and high-end estimates to better reflect the multiple unknowns in predicting when heat and AQI events may take place and how many disconnected customers they may affect.

Finally, the Company has made preliminary estimates of the costs of implementing the heat and AQI event plans. Those costs are not included in the Company's proposed multiyear rate plan for 2025-2026, since the Commission has not yet ordered us to incur them. Actual costs are very difficult to predict because they will depend on at least six distinct variables, discussed in section G, any one of which is challenging to forecast. Bad debt impacts are particularly challenging to forecast. However, the Company is not seeking any Commission determination on the reasonableness of our cost estimates; we agree with OAG-RUD's recommendation that actual costs, which can be known only after the fact, are a better basis for future cost recovery decisions. Our estimates here are provided only to inform the Commission's weighing of costs and benefits in deciding whether the Company should implement the heat and AQI event plans.

Dated: June 3, 2025

Northern States Power Company

CERTIFICATE OF SERVICE

I, Joshua DePauw, 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-25-27

Dated this 3rd day of June 2025

/s/

_____

Joshua DePauw
Regulatory Administrator

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