

June 16, 2023

Mr. Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 East Seventh Place, Suite 350  
Saint Paul, MN 55101-2147

RE: Docket No. 23-73: In the Matter of Xcel Energy's 2021 Annual Safety, Reliability and Service Quality Report and Proposed System Average Interruption Frequency Index (SAIFI), System Average Interruption Duration Index (SAIDI), and Customer Average Interruption Duration Index (CAIDI) Reliability Standards for 2022

Dear Mr. Seuffert:

The City of Minneapolis ("Minneapolis") respectfully submits these comments regarding Xcel Energy service reliability as reported in the most recent annual Safety Reliability and Service Quality report and within the Xcel Energy MN Electric Service Quality Interactive Map ("Map")<sup>1</sup>.

Within the May 18, 2023 Order, the Commission accepted the Department of Commerce recommendation to "*Refer the City of Minneapolis' concerns regarding Xcel's reliability...to the Company's 2023 Service Reliability and Service Quality Docket.*"<sup>2</sup> In response to the order point, Minneapolis submits comments related to reliability for the Commission's consideration under this docket, and addresses some of the topics from Xcel's Annual Report filed March 31, 2023.

As we noted in comments regarding locational reliability earlier this year, the Map is an excellent resource, simple to use, and helpful for identifying locational differences in service levels.<sup>3</sup>

Our responses to select questions from the Commission and specific recommendations follow.

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<sup>1</sup> Xcel Energy 2022 MN Electric Service Quality Interactive Map.

<https://xeago.maps.arcgis.com/apps/webappviewer/index.html?id=6b87f4d407864b939bcea05aad05bdd1>

<sup>2</sup> Docket Nos. 17-401 and 20-406 Commission Order.

<https://www.edockets.state.mn.us/edockets/searchDocuments.do?method=showPoup&documentId={F0AB2F88-0000-CF31-913B-213E0A3B63F7}&documentTitle=20235-195924-02>. p. 2, 3. May 18, 2023.

<sup>3</sup> City of Minneapolis Comments. Docket Nos.: 17-401 In the Matter of a Commission Investigation to Identify and Develop Performance Metrics and, Potentially, Incentives for Xcel Energy's Electric Utility Operations and 20-406 In the Matter of Xcel Energy's Annual Report on Safety, Reliability, and Service Quality and Petition for Approval of Electric Reliability Standards. p. 1. Jan. 6, 2023.

## **2. Are the utilities' reports consistent with recent Orders and Minn. Rules Ch. 7826 on Electric Utility Standards?**

According to Xcel, the Company has not actively tracked inquiries, complaints, or disputes related to DERs and the interconnection process as required by the Commission's November 9, 2022 Order in Docket No. E002/22-162.<sup>4</sup>

The Order also requires documentation for responsiveness in days, beginning from the date of initial customer contact to the date of the Company's reply received through Xcel Energy's call center, email, or otherwise.

The City requests that the Commission uphold the Order and require Xcel to take necessary steps to comply with tracking all DER complaints and response times so that 2023 SRSQ data is as complete as possible. One possible expedient solution that could be implemented immediately is a shared tracking spreadsheet to record DER complaints taken by the call center and other staff.

## **3. At what level should the Commission set the utilities' 2023 Reliability Standards?**

The City of Minneapolis recommends accepting the proposed second quartile goal for 2023 standards for SAIFI, SAIDI, and CAIDI.

Minneapolis also recommends setting a goal of the first quartile as a reliability standard to be phased in over time and adopted in a future year to allow the Company a reasonable amount of time to plan for how to best meet the standards.

Based on historic data, the first quartile appears to be achievable for Xcel and has been accomplished at least once for each SAIFI, SAIDI, and CAIDI in recent years.<sup>5</sup> Consistently achieving the first quartile would result in more reliable service for Xcel's Minnesota customers with shorter and less frequent outages.

Additionally, Minneapolis agrees with Xcel's position that advanced metering infrastructure investments planned in Minnesota will help the Company attain higher reliability service as well.<sup>6</sup> It is reasonable for customers to expect higher performance as a result of the investments.

## **5. Are there other issues or concerns related to this matter?**

As noted above, Minneapolis filed comments related to locational reliability under 20-406 and was directed by the Commission at the recommendation of Commerce to file our concerns and recommendations under this docket. The comments regarding locational reliability are reiterated below for this record.

Minneapolis values the goal of equitable locational reliability within Xcel Energy's service area, as well as equitable, reliable service when compared to other utilities serving Minnesota.

The U.S. Energy Information Administration (EIA) publishes IEEE reliability metrics for utilities in the

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<sup>4</sup> Xcel Report Part I p. 15.

<sup>5</sup> Xcel Report Part II p. 36-38.

<sup>6</sup> Xcel Report Part II p. 39.

United States annually, including System Average Duration Index (SAIDI), System Average Interruption Frequency Index (SAIFI), and Customer Average Interruption Duration Index (CAIDI).<sup>7</sup> Table 2 shows sample 2021 data for five utilities serving the Twin Cities area, including Xcel.

	All Events (With Major Event Days)			Without Major Event Days				
Utility Name	SAIDI (minutes per year)	SAIFI (times per year)	CAIDI (minutes per interruption)	SAIDI (minutes per year)	SAIFI (times per year)	CAIDI (minutes per interruption)	Number of Customers	Outages Recorded Automatically
Connexus Energy	38.792	0.501	77.429	27.535	0.367	75.027	139,583	Y
Dakota Electric Association	57.700	0.680	84.853	21.000	0.330	63.636	111,103	Y
Shakopee Public Utilities	7.323	0.114	64.237	7.323	0.114	64.237	18,772	N
Wright-Hennepin Coop Elec Assn	34.629	0.484	71.548	30.723	0.484	63.477	53,390	Y
Northern States Power Co - Minnesota	129.935	1.042	124.698	92.270	0.934	98.790	1,311,845	Y

**Table 2 EIA 2021 Electric Power Industry Report: Reliability metrics for Xcel Energy and other utilities serving the Twin Cities Metro Area.**

Minneapolis is concerned notes that the 2021 EIA data shows significant disparity in service reliability levels between Xcel Energy and four neighboring utilities in the Metro Twin Cities area, with Xcel customers experiencing more frequent and longer outages on average. The data demonstrates an opportunity and need for Xcel to improve its level of service reliability for Minnesota customers.

There are now federal resources to help improve reliability in Minnesota, and Minneapolis encourages Xcel to consider pursuing funding opportunities to address areas with reliability and service issues to help offset the costs associated with needed upgrades that are outside of its capital improvement plan. The data that Xcel utilized to develop the reliability outputs for the Map should allow Xcel to actively plan for improvements in geographies where customers are experiencing multiple outages per year and/or lengthy outages every year.

The City of Minneapolis views this as a high priority and requests that the Commission direct Xcel to create a plan to close the locational reliability gap so that customers being served by the poorest performing

<sup>7</sup> [EIA's Annual Electric Power Industry Report](#), Form EIA-861.

feeders are brought to a similar level of service as those on higher performing feeders experience based on rolling three year historic data. The standard of 'higher performing feeders' could be the statewide average or some other measure that is meaningful and achievable.

## Summary

Xcel's Safety Reliability and Service Quality Reports and reliability maps are excellent resources for guiding efforts to deliver more equitable service to customers across geographies and to communities of color within Xcel's service area.

The City of Minneapolis recommends the Commission:

- Uphold the November 9, 2022 Order requiring Xcel to track all DER complaints and response times so that 2023 SRSQ data is as complete as possible.
- Accept Xcel's proposed second quartile goal for 2023 standards for SAIFI, SAIDI, and CAIDI.
- Set a goal of the first quartile as a reliability standard to be phased in over time.
- Direct Xcel to create a plan to close the locational reliability gap so that customers being served on the poorest performing feeders are brought to a similar level of service as those on higher performing feeders experience based on rolling three year historic data.

Minneapolis appreciates the Commission's consideration of our Comments.

Respectfully submitted,



Kim W. Havey (He/Him)  
Division Director  
Sustainability, Healthy Homes and the Environment

STATE OF MINNESOTA )

) ss.

**CERTIFICATE OF SERVICE**

COUNTY OF HENNEPIN )

I, Stacy A. Miller, of the City of Minneapolis, County of Hennepin, State of Minnesota, affirm that on the 16th day of June 2023, I served a copy of the following via e-mail and/or via U.S. Mail:

**COMMENTS OF THE CITY OF MINNEAPOLIS regarding Docket No. 23-73**

at the last known mailing addresses and email addresses of said entities/individuals on the attached Service List. If by U.S. Mail, I placed said document in postage prepaid envelope and placed same in the U.S. Post Office in Minneapolis, Minnesota for delivery by the United States Postal Service.



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