



414 Nicollet Mall
Minneapolis, Minnesota 55401

**PUBLIC DOCUMENT
SECURITY, TRADE SECRET, AND PRIVATE
DATA ON INDIVIDUALS EXCISED**

April 1, 2014

—VIA ELECTRONIC FILING—

Burl W. Haar
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101

RE: ANNUAL REPORT AND PETITION
SERVICE QUALITY PERFORMANCE AND PROPOSED RELIABILITY MEASURES
DOCKET NO. E002/M-14-131

Dear Dr. Haar:

Northern States Power Company, doing business as Xcel Energy, submits the enclosed Electric Annual Service Quality Performance Report and Petition of Northern States Power Company, requesting the Commission accept our 2013 report and approve our proposed reliability standards for 2014.

Security, Trade Secret, and Private Data on Individuals Justification

This submission contains information regarding the Company's feeders and other system components, and associated customers served. This information is "security information" as defined by Minn. Stat. § 13.37, subd. 1(a). Xcel Energy believes the information could be manipulated to reveal the location and size of facilities serving our customers. The public disclosure or use of this information creates an unacceptable risk because those who want to disrupt the electrical grid for political or other reasons may learn which facilities to target to create the greatest disruption. For this reason, pursuant to Minn. Stat. § 13.37, subd. 2, we have excised this data from the public version of our filing.

This submission also contains proprietary programs Xcel Energy has developed and maintained internally to plan and manage system reliability. This information is "trade

secret” information as defined by Minn. Stat. §13.37(1)(b). This information derives independent economic value from not being generally known or readily ascertainable by others who could obtain a financial advantage from its use. For this reason, pursuant to Minn. Stat. § 13.37, subd. 2, we have excised this data from the public version of our filing.

Finally, this submission includes “private data on individuals,” such as customer names and outage events from which they were impacted. This information is maintained by the Company as private customer data, and for this reason, pursuant to Minn. Stat. § 13.679, we have excised this data from the public version of our filing.

We have electronically filed this document with the Minnesota Public Utilities Commission, and notice of the filing has been served on the parties on the attached service list.

Please contact Rebecca Eilers at (612) 330-5570 or rebecca.d.eilers@xcelenergy.com or me at (612) 330-7529 or paul.lehman@xcelenergy.com if you have any questions regarding this filing.

Sincerely,

/s/

PAUL J LEHMAN
MANAGER, REGULATORY COMPLIANCE & FILINGS

Enclosures

c: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger	Chair
David Boyd	Commissioner
Nancy Lange	Commissioner
Dan Lipschultz	Commissioner
Betsy Wergin	Commissioner

IN THE MATTER OF NORTHERN STATES
POWER COMPANY ANNUAL REPORT ON
SAFETY, RELIABILITY, AND SERVICE
QUALITY FOR 2013; AND PETITION FOR
APPROVAL OF ELECTRIC RELIABILITY
STANDARDS FOR 2014

DOCKET NO. E002/M-14-131

**ANNUAL REPORT AND
PETITION**

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission this Annual Report on our safety, reliability, and service quality performance for 2013. We make this filing pursuant to Minn. R. 7826.0400, 7826.0500, and 7826.1300. This filing also includes our Petition for approval of the Company's proposed reliability standards for the year 2014, as required under Minn. R. 7826.0600. In addition, this Annual Report contains several compliance items from varying dockets which we discuss in the section Additional Reporting Requirements on pages 17-18 below.

We respectfully request that the Commission accept our annual report for 2013 and approve our proposed reliability standards for 2014.

I. SUMMARY OF FILING

A one-paragraph summary of this filing accompanies this Petition pursuant to Minn. R. 7829.1300, subp. 1.

II. SERVICE ON OTHER PARTIES

Xcel Energy has filed this document in eDockets and served a summary of the filing on all parties on Xcel Energy's miscellaneous electric service list, pursuant to Minn. R. 7829.1300, subp. 2.

III. GENERAL FILING INFORMATION

Xcel Energy provides the following required information pursuant to Minn. R. 7829.1300, subp. 3.

A. Name, Address, and Telephone Number of Utility

Northern States Power Company
414 Nicollet Mall
Minneapolis, Minnesota 55401
(612) 330-5500

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

Alison Archer
Assistant General Counsel
Xcel Energy
414 Nicollet Mall - 5th Floor
Minneapolis, MN 55401
(612) 215-4662

C. Date of Filing and Date Standards Take Effect

The date of this filing is April 1, 2014. Xcel Energy requests that the Commission accept this annual report on the Company's performance for 2013. Additionally, we request that our proposed reliability standards be approved for the year 2014. Our report on reliability performance for 2014, subject to the standards approved by the Commission, will be filed on or before April 1, 2015, as required under Minn. R. 7826.0500, subp. 1, for the January 1 through December 31, 2013 period.

D. Statute Controlling Schedule for Processing the Filing

No specific statute imposes a schedule controlling the processing of this filing. Pursuant to Minn. R. 7826.1300, this report is to be filed as a miscellaneous tariff filing under Minn. R. 7829.0100, subp. 11. Under Minn. R. 7829.1400 governing miscellaneous filings, initial comments are due within 30 days of filing, with reply comments due ten days thereafter.

E. Utility Employee Responsible for Filing

Paul J Lehman
Manager, Compliance and Filings
Xcel Energy
414 Nicollet Mall – 7th floor
Minneapolis, Minnesota 55401
(612) 330-7529

IV. DESCRIPTION AND PURPOSE OF FILING

Legislation passed in 2001 required that the Commission establish safety, reliability, and service quality standards for electric distribution utilities. After a rulemaking process, the Commission adopted rules that became effective on January 28, 2003. These rules contain both performance standards and reporting requirements. Additionally, the rules require individual utilities to propose electric reliability standards each year for approval by the Commission.

In compliance with the rules, this filing is organized into the following sections:

- Safety Performance for 2013
- Reliability Performance for 2013
- Service Quality Performance for 2013
- Additional Reporting Requirements
- Proposed Electric Reliability Standards for 2014

On April 1, 2013, the Company filed proposed reliability standards for 2013. The Commission approved our proposed standards in its January 13, 2014 Order in Docket No. E002/M-13-255. This filing contains information on our proposed reliability standards for 2014, as well as information on our performance for 2013 under the approved standards. The standards we propose for 2014 are calculated using the same methodology as previously approved for our 2013 reliability standards; however, as discussed below, we did evaluate and consider other calculation methodologies as well.

SAFETY PERFORMANCE FOR 2013

***7826.0400 Annual Safety Report.** On or before April 1 of each year, each utility shall file a report on its safety performance during the last calendar year. This report shall include at least the following information:*

- A. Summaries of all reports filed with United States Occupational Safety and Health Administration (OSHA) and the Occupational Safety and Health Division of Minnesota Department of Labor & Industry during the calendar year.*

During 2013, we continued our commitment to provide a safe work environment for our employees and to promote awareness of safe work practices.

Each year, the U.S. Department of Labor, Bureau of Labor Statistics Survey of Occupational Injuries and Illnesses requests information on randomly selected plants and facilities operated by Xcel Energy. We provide as **Attachment A** to this Annual Report, a table containing a summary of the data requested by the U.S. Department of Labor for 2012. Additionally, this table includes the required information from the U.S. Occupational Safety and Health Administration Form 300.

- B. A description of all incidents during the calendar year in which an injury requiring medical attention or property damage resulting in compensation occurred as a result of downed wires or other electrical system failures and all remedial action taken as a result of any inquiries or property damage described.*

Attachment B to this Annual Report includes the required information regarding property damage resulting from downed wires or other electrical system failures. In general, when an incident occurs from a downed wire or failed equipment, the Company takes the necessary action to replace, repair or otherwise fix its equipment.

In 2013, the Company made no payments in compensation for injuries requiring medical attention resulting from downed wires or other electrical system failures.

RELIABILITY PERFORMANCE FOR 2013

In Compliance with the Commission's January 13, 2014 Order, we provide additional information in this Annual Report describing the policies, procedures and actions that we have implemented, or are planned to assure reliability:

- 3. Xcel shall augment its next annual filing to include a description of the policies, procedures, and actions that it has implemented, and plans to implement, to assure reliability, including information on how it is demonstrating proactive management of the system as a whole, increased reliability, and active contingency planning.*
- 4. Xcel shall incorporate into its next annual filing a summary table that allows the reader to more easily assess the overall reliability of the system and identify the main factors that affect*

reliability.

5. *Xcel shall continue to report on the major causes of outages for major event days.*
6. *Xcel shall consider other factors, in addition to historical data, on which to base its reliability indices for 2013 in an effort to demonstrate its commitment toward improving reliability performance.*
7. *Xcel shall continue its efforts in the reporting of major service interruptions to the Commission's Consumer Affairs Office.*

Below we outline, by Order point, where in this Annual Report we have provided the required information:

Order Points 3 and 4: We provide this information in our Distribution System Performance Summary as **Attachment M**.

Order Point 5: We provide this information as well as our Momentary Average Interruption Frequency Index (MAIFI) results as **Attachment N**.

Order Point 6: We provide this information in the Section, "Proposed Electric Reliability Standards for 2014," beginning on page 21 of this report.

Order Point 7: We discuss our major service interruptions in this Annual Report in the Section discussing Minn. Rule 7826.0500.

7826.0500 Reliability Reporting Requirements.

Subpart 1. Annual Reporting Requirements. *On or before April 1 of each year, each utility shall file a report on its reliability performance during the last calendar year. This report shall include at least the following information:*

- A. *The utility's SAIDI for the calendar year, by work center and for its assigned service area as a whole.*
- B. *The utility's SAIFI for the calendar year, by work center and for its assigned service area as a whole.*
- C. *The utility's CAIDI for the calendar year, by work center and for its assigned service area as a whole.*
- D. *An explanation of how the utility normalizes its reliability data to account for major storms.*

On April 1, 2013, as required by Minn. R. 7826.0600, we proposed reliability standards for 2013 for each of our four Minnesota work centers.¹ The Commission approved our proposed standards in their January 13, 2014 Order in Docket No. E002/M-13-255. The table below presents our 2013 reliability performance results compared to these standards. We note that these reliability statistics are calculated using the methodology previously-approved by the Commission, which we outline below:

- Include outages occurring at all levels (distribution, substation, and transmission).
- Include all outage cause codes.
- Where applicable, include credit for partial restoration.
- Base calculations on the number of customers' billing accounts and meters.
- Base calculations on storm-normalized data.

We determine regional storm day thresholds based on the average number of sustained outages per day.² Any day that meets or exceeds the threshold is considered a storm day for the qualifying region. This means that all outages that start on a storm day (which lasts from midnight to midnight) for a particular work center are excluded from the calculation of the various reliability indices for that work center.

For 2013, we used the following storm day threshold calculation procedures:

- Using the previous five years of outage history for each region, we:
 - Calculate the number of sustained outages per day;
 - Calculate the average number of sustained outages per day; and
 - Calculate the standard deviation of sustained outages per day.
- Based on the above methodology, we set a unique storm day threshold for each region. A storm day is defined as any day meeting or exceeding the average number of sustained outages per day plus three standard deviations.

¹ The four Minnesota work centers include Metro East, Metro West, Northwest, and Southeast.

² A "sustained outage" is an outage with duration greater than five minutes.

2013 RELIABILITY PERFORMANCE Results

		2013 Performance Results	2013 Standard
Minnesota	SAIDI	93.73	NA
	SAIFI	0.88	NA
	CAIDI	106.06	NA
Metro East	SAIDI	81.28	85.44
	SAIFI	0.83	0.94
	CAIDI	97.75	90.75
Metro West	SAIDI	98.71	97.92
	SAIFI	0.94	0.98
	CAIDI	105.09	100.17
Northwest	SAIDI	95.90	102.56
	SAIFI	0.93	0.87
	CAIDI	102.86	117.94
Southeast	SAIDI	108.83	78.16
	SAIFI	0.75	0.71
	CAIDI	145.11	109.97

As shown above, in 2013 we met five of twelve standards, bolding those standards we did not meet.³ We provide in the following section, a summary as to why we did not meet the established standards in these areas.

- E. An action plan for remedying any failure to comply with the reliability standards set forth in part 7826.0600 or an explanation as to why noncompliance was unavoidable.*

As we have noted in previous annual reports, due to the fact that these goals are five-year averages, we would expect to achieve target results 50 percent of the time and miss the target 50 percent of the time. Taken together, several days of storms that cause extensive outages but do not qualify for storm days can quickly erode a standard that is based on average performance. Several of our missed standards this year were missed by narrow amounts that cannot be explained by any one large event, but rather a few small events over the course of the year.

As described in our Distribution System Performance Summary provided as Attachment M to this Annual Report, the Company will continue our on-going assessments of reliability, seeking to implement system improvements and maintenance to achieve the largest improvements in reliability measurements. We are

³ We note that Xcel Energy operates under two sets of reliability standards – those approved by the Commission under Minn. R. 7826.0600, and those included in the Company’s service quality tariff. The Commission approved the reliability measures in our service quality tariff in its Order dated August 12, 2013 in Docket No. E,G002/M-12-383.

committed to providing reliable service to our customers and discuss the specific work centers below.

1. *Metro East*

Our CAIDI for the Metro East work center exceeded the threshold by 7 minutes. In examining the outages in the Metro East work center which caused these thresholds to be exceeded, as mentioned above, we found that there was not one large event that caused this but several small events each contributing less than two minutes to the total CAIDI over the course of the year.

2. *Metro West*

Our SAIDI performance in the Metro West work center exceeded the threshold by less than a minute and our CAIDI by 4.92 minutes. We narrowly missed our SAIDI by less than one percent of our standard. Our CAIDI performance can be attributed to a few events including two cable failures in June and a connector failure on August 5, 2013 that caused a feeder level outage.

3. *Northwest*

SAIFI for the Northwest work center region exceeded the threshold by .06 interruptions. Again, this is very close to our goal considering that it is based on a five-year average. However, we did look at the data and found that one event caused by a cable failure contributed .04 interruptions to the overall SAIFI which is more than 60 percent of the SAIFI threshold gap.

4. *Southeast*

Our SAIDI and CAIDI performance in the Southeast work center exceeded our threshold by 30.67 and 35.14 minutes, respectively. In 2013, we had five significant conductor galloping events caused by high winds in April, August and October that accounted for approximately 15 minutes of total SAIDI and CAIDI. These were all lengthy feeder outages with a great deal of territory to cover to find the issue. In addition, there was a substation level outage in May caused by animal contact which contributed nearly 8 minutes to our SAIDI and nearly 2 minutes to CAIDI.

Our SAIFI performance narrowly missed the threshold by .04 interruptions. The substation outage in May mentioned above contributed .05 interruptions alone to SAIFI.

- F. *To the extent feasible, a report on each interruption of a bulk power supply facility during the calendar year, including the reasons for interruption, duration of interruption, and any remedial steps that have been taken or will be taken to prevent future interruption.*

During 2013, there were no generation outages on Xcel Energy's system that caused an interruption of service to firm electric customers. All curtailments of customers subject to load management rates or Demand-Side Management programs were consistent with the terms of the load management tariffs and DSM programs.

We provide the required information regarding transmission outages as **Attachment C**.

- G. *A copy of each report filed under part 7826.0700.*

Minn. R. 7826.0700, subp. 1 requires a utility to promptly inform the Commission's Consumer Affairs Office of any major service interruption occurring on the utility's system. "Major service interruption" is defined under Minn. R. 7826.0200, subp. 7 as an interruption of service at the Feeder level or above and affecting 500 or more customers for one or more hours. Xcel Energy regularly sends the CAO notification of *all* sustained outages occurring at the Feeder level or above, which includes reporting outages that are not necessarily large enough or long enough to meet the definition of a major service interruption under Minn. R. 7826.0200, subp. 7.

We are committed to providing the CAO with timely and accurate information. Our Customer Advocate Group generally sends these notifications via e-mail directly to the CAO. In most cases, our Customer Advocates forward a copy of the internal email outage notifications they receive from our Control Center. During 2013, there were 605 outages on Xcel Energy's system that meet the definition of "major service interruption." We provide as **Attachment D** to this Annual Report copies of the notifications.

In an effort to provide the timeliest information, whenever possible, our Customer Advocate Group sends the CAO the first outage notification received from the Control Center for an outage event. First notifications often do not include full cause and/or follow-up action information since the restoration crew may not have yet completed its work related to the event. However, we believe it is more important to give the CAO notification as soon as possible rather than waiting for complete information before sending the CAO an alert.

We note that during high volume outage times, it is possible the Control Center does not send an email for each and every outage event. Often during these high volume events, the Company's Customer Advocate Group works with the Control Center to obtain more general status updates in lieu of individual emails. These updates, which are also forwarded to the CAO, usually include information on communities affected, total customers out of service, and any available information on expected restoration times. If available, information is also provided regarding crews brought in from other areas to assist restoration during times of escalated operations.

As with any process that involves human intervention, errors will occur, and notices may not be sent to the CAO. There are instances when the Control Center may not create a notice, or the Company's Customer Advocates do not forward a notice to the CAO. In 2013, we did not send an email notice to the CAO for 2 of 605 major service interruptions. We remain committed to providing notification for all qualifying outages, and will continue to monitor and improve our processes, as appropriate.

Minn. R. 7826.0700, subp. 2 requires a utility to file a written report on any major service interruption in which ten percent or more of its Minnesota customers were without service for 24 hours or more. During 2013, there were no such interruptions on Xcel Energy's system.

- H. *To the extent feasible, circuit interruption data, including:*
- *Identifying the worst performing circuit in each work center;*
 - *Stating the criteria used to identify the worst performing circuit;*
 - *Stating the circuit's SAIDI, SAIFI, and CAIDI;*
 - *Explaining reasons that the circuit's performance is in last place; and*
 - *Describing any operational changes the utility has made, is considering, or intends to make to improve its performance.*

Xcel Energy has a program entitled Feeder Performance Improvement Plan (FPIP). Under this plan, we identify the poorest performing circuits, the outage causes, and any changes needed to improve reliability. Xcel Energy defines poor performing Feeders as those with a SAIFI exceeding three times the average feeder SAIFI value, or a SAIDI exceeding four times the average SAIDI value.⁴ The data used to calculate SAIDI and SAIFI for these feeders is based on distribution level outages, except for planned and public damage, and has not been normalized for storm events.

⁴ SAIFI- 2.666 outages for 2013 in Minnesota. SAIDI – 1,976.05 minutes for 2013 in Minnesota

The FPIP schedule spans the September through August time period, rather than a calendar year. We designed this schedule to implement solutions prior to the storm season and to achieve maximum benefit throughout the year. Thus, the data used to determine the poorest-performing circuits in this report spans the September 2012 to August 2013 period rather than the calendar year.

In September of each year, we calculate SAIFI and SAIDI for the most recent 12 months for each Feeder. We analyze the outage cause data to determine whether operational changes are necessary. Using this data, during the fall and early winter months, we plan any necessary construction projects. We begin construction projects involving overhead equipment first, with a goal of completion prior to the spring storm season. We begin underground construction as soon as possible after frost dissipation.

In accordance with the Commission's April 7, 2006 Order in Docket No E002/M-05-551, the Commission increased the number of Feeders that the Company includes in this report to 25 per work center, for a total of 100. In addition, the Order directed the Company to work with Commission Staff in developing a reporting format. **Attachment E** provides the resulting Feeder performance data for 2013, by work center, in two sections.

The first section of each work center's report provides a list of Feeders, sorted by SAIDI, using calendar year data and the format requested by Commission Staff. We note this format includes additional outages such as bulk power supply and planned outages that are not used internally to identify poor performers. Thus using the Company's criteria for identifying poorest-performing feeders will not result in 25 actual "poor performers" for each region, or 100 system-wide.

For this reason, some of the Feeders listed in Attachment E are not actual "poor performers," but rather are included in the list only because the Company is required to identify 25 Feeders, and their performance values were greater than other Feeders (but less than poor performer Feeders in that particular work center). For those top Feeders in each region that were identified as poor performers under the internal FPIP program, we have completed a reliability review and provide information on the reasons for the poor performance and any planned improvements in Attachment E.

We evaluate the worst performing feeders annually and prepare plans and projects to remedy the causes of outages; however, despite these efforts occasionally a feeder will reappear on the worst performer list. This can be caused by several reasons, including: storms, distance from first responders, or quickly growing vegetation. In

addition, feeders can be on the list due to poor tap performance which may not have been investigated in previous years.

- I. *Data on all known instances in which nominal electric service voltages on the utility's side of the meter did not meet the standards of the American National Standards Institute for nominal system voltages greater or less than voltage range B.*

Voltage deviations typically result with customers experiencing problems with electrical equipment. High voltage can result in bright light bulbs, and eventually shortens the life of the bulbs, or can result in electric motor damage. Low voltage can have equally-significant consequences.

A first responder initially handles customer voltage complaints. If a non-voltage cause cannot be found, we initiate a voltage investigation, and install a recording voltmeter. In the metro area, Xcel Energy has a dedicated technician that sets these recorders and performs the voltage investigations. In the non-metro areas, a first responder or a district representative conducts the voltage investigations.

Xcel Energy's allowable service voltage range is 120 volts plus/minus 5 percent, or a minimum of 114 volts to a maximum of 126 volts. As shown in the below table, Xcel Energy's allowable service voltage range falls within the American National Standards Institute (ANSI) voltage range B.

Xcel Energy Allowable Service Voltage Range

	Minimum Voltage	Maximum Voltage
ANSI Voltage Range B (service voltage)	110	127
Xcel Energy Range (service voltage)	114	126

During 2013, the Company conducted 496 voltage investigations. These investigations resulted in a diagnosis of a specific voltage problem in 232 of these cases. These problems are typically the result of transformer overloads or some other equipment malfunction, such as capacitor banks or voltage regulators. In all other cases, either no problem was found or the root cause was attributed to something other than voltage deviations. In cases where the Company finds the voltage to be out of the acceptable range, we take appropriate actions, including but not limited to swapping transformers, upgrading transformers, or checking capacitor banks.

J. *Staffing levels at each work center, including the number of full-time equivalent positions held by field employees responsible for responding to trouble and for the operation and maintenance of distribution lines*

	Metro East	Metro West	Northwest	Southeast	Other *
2013 Work Center Staffing Level Totals	136	195	34	54	51

* Xcel Energy field employees associated with the Fargo and Sioux Falls Service Centers respond to trouble and perform distribution line operation and maintenance in western Minnesota and the Dakotas.

Finally, we note that although we are reporting staffing levels by work center as required under the Rules, our field personnel respond to trouble and perform duties in other work centers as the need arises.

K. *Any other information the utility considers relevant in evaluating its reliability performance over the calendar year.*

We are committed to providing reliable service to our customers. We are available to provide any additional information the Commission may require on this issue.

SERVICE QUALITY PERFORMANCE 2013

7826.1400 Reporting Meter Reading Performance. *The annual service quality report must include a detailed report on the utility’s meter-reading performance, including for each customer class and for each calendar month:*

- A. *The number and percentage of customer meters read by utility personnel.*
- B. *The number and percentage of customer meters self-read by customers.*
- C. *The number and percentage of customer meters that have not been read by utility personnel for periods of six to 12 months and periods of longer than 12 months, and an explanation as to why they have not been read.*

We provide the required meter reading information as **Attachment F** to this filing. Attachment F includes the reporting refinements discussed in our Reply Comments filed in the 2012 Annual Report electric service quality docket, Docket No. E002/M-13-255 on July 31, 2013. Attachment F excludes multiple reads per month when reporting meter read totals so that the “Percent Read by Company” does not exceed 100% in any given month, and we have reported the number of meters installed by month rather than only a year-end total.

D. *Data on monthly meter reading staffing levels, by work center or geographical area.*

The following data for 2013 includes full-time equivalent numbers and does not count temporary staff positions. The “Other” category numbers includes Xcel Energy personnel located in the Fargo and Sioux Falls Service Centers who read meters in western Minnesota and the Dakotas.

	Jan-13	Feb-13	Mar-13	Apr-13	May-13	Jun-13	Jul-13	Aug-13	Sep-13	Oct-13	Nov-13	Dec-13
Metro East	6	6	6	6	6	6	6	6	6	5	5	5
Metro West	5	5	5	5	5	5	5	5	5	5	5	5
Northwest	4	4	4	4	4	4	4	4	4	4	4	4
Southeast	4	4	4	4	4	4	4	3	3	3	3	3
Other	2	2	2	2	2	1	1	1	1	1	1	1

7826.1500 Reporting Involuntary Disconnections. *The annual service quality report must include a detailed report on involuntary disconnections of service, including, for each customer class and each calendar month:*

- A. *The number of customers who received disconnection notices.*
- B. *The number of customers who sought cold weather rule protection under chapter 7820 and the number who were granted cold weather rule protection.*
- C. *The total number of customers whose service was disconnected involuntarily and the number of these customers restored to service within 24 hours.*
- D. *The number of disconnected customers restored to service by entering into a payment plan.*

We provide the required information as **Attachment G** to this Annual Report.

7826.1600 Reporting Service Extension Request Response Times. *The annual service quality report must include a report on service extension request response times, including, for each customer class and each calendar month:*

- A. *The number of customers requesting service to a location not previously served by the utility and the intervals between the date service was installed and the later of the in-service date requested by the customer or the date the premises were ready for service.*
- B. *The number of customers requesting service to a location previously served by the utility, but not served at the time of the request, and the intervals between the date service was installed and the later of the in-service date requested by the customer or the date the premises were ready for service.*

We provide the required information for Part A above as **Attachment H** to this Annual Report. Attachment H includes data on service installations that require construction.

For Part B above, we note that 333,815 customers requested service at a location previously served by the Company in 2013. With respect to situations where we supply service to a location previously served by the Company, we handle these requests on the next business day. Responding to such a request generally involves setting a meter and connecting the service. Such cases are not reflected in the information provided in Attachment H.

***7826.1700 Reporting Call Center Response Times.** The annual service quality report must include a detailed report on call center response times, including calls to the business office and calls regarding service interruptions. The report must include a month-by-month breakdown of this information.*

We provide the required information as **Attachment I** to this Annual Report.

Pursuant to the Commission's November 3, 2004 Order in Docket No. E002/M-04-511, we have included credit calls in our reported call center response time. However, to be consistent with past reporting practices and for ease of comparison with our historical data, we also provide the data for this metric excluding credit calls.

- Our call center service level *including* credit calls is 80.9 percent of calls answered in 20 seconds or less; and
- Our call center service level *excluding* credit calls is 90.6 percent of calls answered in 20 seconds or less.

Minn. R. 7826.1200, subp. 1 requires that we answer 80 percent of calls made to the business office during regular business hours within 20 seconds. We note that our Call Centers are staffed 24 hours a day, 7 days a week, and our IVR is used in the same manner across this time period, therefore these are our "business hours." So, our performance includes call and service level information on a 24-hours-a-day, 7 days-a-week-basis. Line 31 on Attachment I provides our average speed of answer (ASA), and the rows below break out the ASA by call center.

In our 2012 report, we discussed our plan to implement a new call center application called Call Back Assist (CBA) during 2013. This technology is generically referred to as "virtual hold" because there is a leading vendor by the same name. This is common technology within the contact center industry. When customers call in to the contact center during periods of long wait times, the CBA application provides them the option to be called back automatically instead of waiting in queue. For

example, if the expected wait time is 10 minutes, a customer could select to have their phone ring in approximately 10 minutes instead of waiting on the phone line for 10 minutes listening to hold music; CBA keeps the customer's place in the call queue. JD Power data shows that customers are satisfied with this type of technology.

In order to ensure the best customer experience, we delayed deployment of this technology. We expect to deploy this technology within the Company's jurisdictions in April 2014 on a small scale.

Other improvements we plan to make to Call Center processes in 2014 include online outage reporting. Currently, customers have no option other than to call to report an outage. In addition, we plan to begin offering an option to receive a text update on a customer's outage. Currently customers can opt to receive a phone call with updates.

7826.1800 Reporting Emergency Medical Account Status. *The annual service quality report must include the number of customers who requested emergency medical account status under Minnesota Statutes, section 216B.098, subdivision 5, the number whose applications were granted, and the number whose applications were denied and the reasons for each denial.*

We provide the required information as **Attachment G** to this Annual Report.

7826.1900 Reporting Customer Deposits. *The annual service quality report must include the number of customers who were required to make a deposit as a condition of receiving service.*

During 2013, we requested a total of 652 deposits as a condition of service for our residential customers that had filed for bankruptcy. We request these deposits upon notification from the bankruptcy court and/or the customer of their bankruptcy petition.

7826.2000 Reporting Customer Complaints. *The annual service quality report must include a detailed report on complaints by customer class and calendar month, including at least the following information:*

- A. The number of complaints received.*
- B. The number and percentage of complaints alleging billing errors, inaccurate metering, wrongful disconnection, high bills, inadequate service, and the number involving service-extension intervals, service-restoration intervals, and any other identifiable subject matter involved in five percent or more of customer complaints.*

- C. *The number and percentage of complaints resolved upon initial inquiry, within ten days, and longer than ten days.*
- D. *The number and percentage of all complaints resolved by taking any of the following actions:*
- (1) Taking the action the customer requested;*
 - (2) Taking an action the customer and the utility agree is an acceptable compromise.*
 - (3) Providing the customer with information that demonstrates that the situation complained of is not reasonably within the control of the utility.*
 - (4) Refusing to take the action the customer requested.*
- E. *The number of complaints forwarded to the utility by the commission's Consumer Affairs Office for further investigation and action.*

We provide the required information as **Attachment J** to this Annual Report.

Pages 1-4 of Attachment J contain information on customer complaints handled by the Company's Customer Advocate group. Pages 5-16 contain information on complaints handled upon initial inquiry in the Call Centers.

ADDITIONAL REPORTING REQUIREMENTS

A. Smart Grid Annual Report

In compliance with the Commission's Order dated June 5, 2009 and the March 4, 2011 NOTICE CLARIFYING INFORMATION SOUGHT IN SMART GRID REPORTS in Docket No. E999/CI-08-948, we provide an update on our Smart Grid projects as **Attachment K** of this Annual Report.

B. Meter Equipment Malfunctions Tariff Annual Report

In compliance with the Commission's Order dated November 30, 2010 in Docket Nos. G002/CI-08-871 and E,G002/M-09-224, we provide a review and report on the following items relating to our Meter Equipment Malfunctions tariff:

- Volume of Investigate and Remediate Field orders;
- Volume of Investigate and Refer Field orders;
- Volume of Remediate Upon Referral Field orders;
- Average response time for each of the above categories by month and year;
- Minimum days, maximum days, and standard deviations for each category; and

- Volume of excluded field orders.

In summary, we performed within the field response parameters prescribed in our tariff, completing a total of 2,214 electric and 3,286 natural gas orders with an average response time of 2.99 and 3.05 days, respectively. We additionally completed 287 electric and 608 natural gas field orders for which we experienced access and environmental issues, both allowable Exclusions under the tariff. We provide our detailed results as **Attachment O**.

C. MAIFI

In Compliance with ordering paragraph 32 of the Commission's FINDINGS OF FACT, CONCLUSIONS, AND ORDER issued September 3, 2013 in Docket No. E002/GR-12-961, we provide additional reporting of currently available MAIFI (Momentary Average Interruption Frequency Index) data as Attachment N1 to this filing.

D. Notice Requesting Information from Xcel Energy on Substation Equipment Reliability

In response to the Commission's February 18, 2014 Notice Requesting Information from Xcel on Substation Equipment Reliability in this docket, we provide our reply as Attachment P to this filing.

PROPOSED ELECTRIC RELIABILITY STANDARDS FOR 2013

As discussed above, we submitted proposed reliability standards for 2013 on April 1, 2013. Our proposed standards were approved by the Commission in its January 13, 2014 Order.

In compliance with the Commission's January 13, 2014 Order, we did again consider other factors, in addition to historical data, on which to base our reliability indices for 2014 in an effort to demonstrate our commitment toward improving reliability performance. We considered other factors and methodologies such as means, medians, and standard deviations. However, after evaluating these calculations, we discovered our results would have been largely the same as they are under our current five-year rolling average methodology.

For instance, in examining a target based on the median, mean (after removing high and low values) and using the lowest value from the other three methods (historic, median and mean), we determined the outcome would not have been much different.

We provide the analysis as **Attachment L1** and provide a summary of the results below:

- *Metro East*: We would have remained on target for both SAIDI and SAIFI and remained off target for CAIDI (however, we would have been very close to target using the median calculation).
- *Metro West*: The results would have been the same for SAIFI and CAIDI. SAIDI would have remained off target for two methods and changed to on target using the median calculation.
- *Northwest*: The results would have been the same for all three metrics.
- *Southeast*: The results would have been the same for all three metrics.

After determining the results would not have varied greatly and the belief that there is value in maintaining a historical comparison baseline that has been in effect since 2003, we concluded it would be useful to preserve our five-year rolling methodology. However, we are open to guidance and suggestions for changing the calculation methodology if that is what the Commission prefers.

That being said, we calculated the standards that we propose for 2014 using the same methodology approved for our 2013 reliability standards.

On pages 6 and 7 of this filing, we provide details regarding the approved method of calculation and storm-normalization process used for our 2013 reliability standards. Because we are proposing no changes to this methodology for the development of our 2014 standards, in this Section, we simply provide a brief discussion of reliability indices and our method of calculation, and we set forth our proposed reliability standards for 2014.

Minn. R. 7826.0600, subp. 1 requires each utility to propose standards for the following reliability indices:

- System Average Interruption Duration Index,
- System Average Interruption Frequency Index, and
- Customer Average Interruption Duration Index.

SAIDI measures the average total number of minutes a customer was without power during a calendar year. This index is calculated as follows:

$$\text{SAIDI} = \frac{\text{Total Customer Minutes of Sustained Outages}}{\text{Number of Customers}}$$

SAIFI measures the average frequency of sustained service interruptions per customer during a calendar year and is calculated as follows:

$$\text{SAIFI} = \frac{\text{Total Number of Sustained Customer Interruptions}}{\text{Number of Customers}}$$

CAIDI measures the average outage time a customer could expect to be without power if they experienced a sustained outage and is calculated as follows:

$$\text{CAIDI} = \frac{\text{Total Customer Minutes of Sustained Outages}}{\text{Total number of Sustained Customer Interruptions}}$$

Our electric reliability standards approved for 2013 were based on the average of our 5-year reliability performance (2009-2013). Consistent with that methodology, we provide as **Attachment L** to this Annual Report, our historical reliability performance for the 2009-2013 period to support our proposed 2014 standards. These calculations use storm-normalized data for all levels of outages (*i.e.* transmission, substation, and distribution) and a customer count based on the number of customers' billing accounts and meters.

Minn. R. Chapter 7826 allows utilities to report reliability performance using "storm-normalized" data. Storm-normalized data is defined by Minn. R. 7826.0200, subp. 9 as "data that has been adjusted to neutralize the effects of outages due to major storms." As noted above, we propose standards for 2013 that are consistent with those approved for 2012.

Minn. R. 7826.0200, subp. 13 defines work center as a portion of a utility's assigned service area that it treats as an administrative subdivision for purposes of maintaining and repairing its distribution system. Xcel Energy defines its work centers under the rule as our regional service areas. These regions are:

- Metro East
- Metro West
- Northwest
- Southeast

Customer outages on our system are categorized by region, and all of our delivery system work management is tied to these regional divisions.

A. Proposed Reliability Standards for 2014

As required by Minn. R. 7826.0600, subp. 1, we propose the following 2014 standards for SAIFI, SAIDI, and CAIDI.

Our proposed standards for SAIDI and SAIFI are the average of the five years of historical data (provided in Attachment L). The CAIDI standards are calculated from the proposed SAIDI and SAIFI standards using the mathematical relationship between the indices: $CAIDI = SAIDI/SAIFI$. The methodology used to calculate these standards is described in detail above, and is summarized below:

- Include outages at all levels (distribution, substation, and transmission).
- Include all causes.
- Include credit for partial restoration.
- Include customers located in Minnesota that are part of the ND/SD work centers.
- Based on the number of customers' billing accounts and meters.
- Based on storm-normalized data.

Proposed 2014 Reliability Standards

		Proposed Standard
Metro East	SAIDI	82.41
	SAIFI	0.88
	CAIDI	93.72
Metro West	SAIDI	97.41
	SAIFI	0.95
	CAIDI	102.11
Northwest	SAIDI	90.27
	SAIFI	0.81
	CAIDI	111.70
Southeast	SAIDI	86.31
	SAIFI	0.71
	CAIDI	121.42

V. EFFECT OF CHANGE UPON XCEL ENERGY REVENUE

Approval of our annual report and the reliability performance standards proposed in this Petition will not result in any changes to Xcel Energy's revenue.

CONCLUSION

Xcel Energy is committed to providing our customers with quality, reliable service. We appreciate this opportunity to report our performance to the Commission, and respectfully request that the Commission accept our annual report on safety, reliability, and service quality. We also request that the Commission approve our proposed reliability standards for 2014 as detailed in this Petition.

Dated: April 1, 2014

Northern States Power Company

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger	Chair
David Boyd	Commissioner
Nancy Lange	Commissioner
Dan Lipschultz	Commissioner
Betsy Wergin	Commissioner

IN THE MATTER OF NORTHERN STATES
POWER COMPANY, A MINNESOTA
CORPORATION, ANNUAL REPORT ON
SAFETY, RELIABILITY, AND SERVICE
QUALITY FOR 2013; AND PETITION FOR
APPROVAL OF ELECTRIC RELIABILITY
STANDARDS FOR 2014

DOCKET NO. E002/M-14-131

**ANNUAL REPORT AND
PETITION**

SUMMARY OF FILING

Please take notice that on April 1, 2014, Northern States Power Company, doing business as Xcel Energy, filed with the Minnesota Public Utilities Commission its Annual Report on safety, reliability, and service quality as required under Minn. R. 7826.0400, 7826.0500, and 7826.1300. This filing also includes a Petition for approval of the Company's proposed electric reliability standards for 2014 as required under Minn. R. 7826.0600. In addition, this Annual Report contains: 1) our annual Smart Grid update in compliance with the Commission's June 5, 2009 Order and the March 4, 2011 Notice in Docket No. E999/CI-08-948; 2) additional reporting of currently available MAIFI (Momentary Average Interruption Frequency Index) in compliance with the Commission's September 3, 2013 Order in Docket No. E002/GR-12-961; 3) a review and report on items relating to our Meter Equipment Malfunctions tariff in compliance with the Commission's November 30, 2010 Order in Docket Nos. G002/CI-08-871 and E,G002/M-09-224; and 4) our response to the Commission's February 18, 2014 Notice Requesting Information from Xcel Energy on Substation Equipment Reliability in this docket.

**ANNUAL REPORT ON SAFETY, RELIABILITY, AND SERVICE QUALITY
FOR 2013 AND PETITION FOR APPROVAL OF
ELECTRIC RELIABILITY STANDARDS FOR 2014**

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- A. Survey of Occupational Injuries & Illnesses
- B. Property Damage Claims
- C. Transmission Outages
- D. Feeder Outage Notifications
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- H. Service Extension Request Response Times
- I. Call Center Response Times
- J. Customer Complaints
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- L1. Other Factors and Methodologies for Setting Reliability Indices
- M. Distribution System Performance
- M1. Minnesota CEMI Map
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- N. MAIFI Results
- N1. Additional MAIFI data
- O. Meter Equipment Malfunctions Tariff Annual Report
- P. Response to the Commission's February 18, 2014 Notice Requesting Information on Substation Equipment Reliability

U.S. Department of Labor- Bureau of Labor Statistics
Survey of Occupational Injuries & Illnesses 2013
Xcel Energy - Minnesota

Data from 2013 OSHA Form 300

Location	Ave Empl Count	Ttl Hours Worked	Severity Counts				Day Count		Injury/Illness Classification Counts					
			Deaths	Days Away	Restricted Duty	Other	Restricted Duty	Lost Time	Injuries	Skin Disorders	Respiratory	Poisoning	Hearing	Other
A.S. King Plant	109	220614	0	0	0	1	0	0	1	0	0	0	0	0
General Office	618	1134422	0	1	0	1	8	5	2	0	0	0	0	0
Maple Grove Service Center	599	1396153	0	3	6	9	151	178	18	0	0	0	0	0
Monticello Nuclear	675	1521593	0	2	0	3	80	60	5	0	0	0	0	0
Prairie Island Nuclear	860	1875385	0	2	0	1	14	129	3	0	0	0	0	0
Sherco Plant	361	748083	0	0	5	7	125	0	12	0	0	0	0	0
St. Cloud Service Center	78	151784	0	0	1	2	60	0	3	0	0	0	0	0
Summary	3300	7048034	0	8	12	24	438	372	44	0	0	0	0	0

Event Number	Event Date	Event Cause Code	Event Cause Description	Paid Sum
EV2013120377	1/17/2013	1106	Conductors - Overhead	\$25.00
EV2013120404	1/13/2013	1107	Conductors - Underground	\$0.00
EV2013120433	1/17/2013	1129	Transformer Under Ground	\$0.00
EV2013120446	1/12/2013	1106	Conductors - Overhead	\$472.98
EV2013120517	1/22/2013	1133	Weather- Damage from	\$1,395.74
EV2013120557	1/25/2013	1106	Conductors - Overhead	\$1,500.00
EV2013120565	1/8/2013	1101	Abnormal Voltage	\$0.00
EV2013120631	1/4/2013	1129	Transformer Under Ground	\$1,350.00
EV2013120633	2/14/2013	1107	Conductors - Underground	\$321.19
EV2013120681	2/20/2013	1136	Outage	\$0.00
EV2013120737	1/20/2013	1101	Abnormal Voltage	\$0.00
EV2013120752	2/1/2013	1107	Conductors - Underground	\$145.00
EV2013120767	2/26/2013	1106	Conductors - Overhead	\$0.00
EV2013120781	2/16/2013	1107	Conductors - Underground	\$0.00
EV2013120785	1/29/2013	1106	Conductors - Overhead	\$0.00
EV2013120793	2/21/2013	1110	Equipment Failure	\$0.00
EV2013120799	2/21/2013	1107	Conductors - Underground	\$1,158.90
EV2013120804	3/4/2013	1136	Outage	\$0.00
EV2013120846	2/12/2013	1136	Outage	\$0.00
EV2013120859	2/26/2013	1107	Conductors - Underground	\$461.17
EV2013120862	1/8/2013	1101	Abnormal Voltage	\$0.00
EV2013120885	3/19/2013	1101	Abnormal Voltage	\$869.21
EV2013120889	2/22/2013	1106	Conductors - Overhead	\$150.00
EV2013120931	3/31/2013	1136	Outage	\$0.00
EV2013120944	4/15/2013	1134	Work Performed Electrical	\$199.00
EV2013120946	2/12/2013	1110	Equipment Failure	\$0.00
EV2013120953	3/25/2013	1101	Abnormal Voltage	\$0.00
EV2013120954	3/6/2013	1107	Conductors - Underground	\$767.56
EV2013120976	2/13/2013	1136	Outage	\$2,595.90
EV2013121005	3/20/2013	1110	Equipment Failure	\$0.00
EV2013121067	3/28/2013	1136	Outage	\$176.26
EV2013121069	4/11/2013	1110	Equipment Failure	\$0.00
EV2013121074	4/24/2013	1106	Conductors - Overhead	\$700.21
EV2013121090	4/14/2013	1136	Outage	\$0.00
EV2013121096	4/22/2013	1110	Equipment Failure	\$0.00
EV2013121097	3/7/2013	1107	Conductors - Underground	\$1,053.19
EV2013121098	4/23/2013	1106	Conductors - Overhead	\$354.28
EV2013121099	3/12/2013	1107	Conductors - Underground	\$0.00
EV2013121107	4/25/2013	1106	Conductors - Overhead	\$0.00
EV2013121108	3/9/2013	1106	Conductors - Overhead	\$146.25
EV2013121110	4/9/2013	1107	Conductors - Underground	\$675.00
EV2013121123	4/23/2013	1106	Conductors - Overhead	\$185.00
EV2013121143	3/18/2013	1136	Outage	\$0.00
EV2013121149	5/8/2013	1122	Poles & Towers	\$150.00
EV2013121150	4/3/2013	1110	Equipment Failure	\$0.00
EV2013121153	4/23/2013	1101	Abnormal Voltage	\$0.00
EV2013121165	4/28/2013	1107	Conductors - Underground	\$0.00
EV2013121168	1/28/2013	1107	Conductors - Underground	\$2,195.70
EV2013121171	4/23/2013	1101	Abnormal Voltage	\$106.00
EV2013121180	5/14/2013	1106	Conductors - Overhead	\$7,246.76
EV2013121182	5/21/2013	1101	Abnormal Voltage	\$0.00

Event Number	Event Date	Event Cause Code	Event Cause Description	Paid Sum
EV2013121247	5/28/2013	1106	Conductors - Overhead	\$0.00
EV2013121257	4/7/2013	1106	Conductors - Overhead	\$78.75
EV2013121292	4/19/2013	1107	Conductors - Underground	\$210.90
EV2013121293	3/8/2013	1136	Outage	\$0.00
EV2013121300	5/2/2013	1136	Outage	\$50.00
EV2013121320	5/22/2013	1107	Conductors - Underground	\$94.50
EV2013121321	5/8/2013	1106	Conductors - Overhead	\$153.00
EV2013121325	5/27/2013	1130	Tree Trimming	\$200.00
EV2013121326	4/18/2013	1110	Equipment Failure	\$0.00
EV2013121381	6/21/2013	1136	Outage	\$0.00
EV2013121381	6/21/2013	1136	Outage	\$10,197.82
EV2013121382	6/21/2013	1136	Outage	\$0.00
EV2013121382	6/21/2013	1136	Outage	\$0.00
EV2013121382	6/21/2013	1136	Outage	\$23,992.08
EV2013121427	4/15/2013	1136	Outage	\$278.00
EV2013121456	6/5/2013	1136	Outage	\$0.00
EV2013121460	7/3/2013	1128	Transformer Overhead	\$236.60
EV2013121466	5/2/2013	1136	Outage	\$3,907.51
EV2013121468	5/31/2013	1136	Outage	\$0.00
EV2013121474	4/18/2013	1110	Equipment Failure	\$0.00
EV2013121482	6/11/2013	1136	Outage	\$0.00
EV2013121495	6/17/2013	1136	Outage	\$0.00
EV2013121506	6/20/2013	1106	Conductors - Overhead	\$545.00
EV2013121509	6/5/2013	1107	Conductors - Underground	\$90.00
EV2013121519	5/28/2013	1136	Outage	\$0.00
EV2013121522	6/18/2013	1101	Abnormal Voltage	\$87.75
EV2013121526	5/9/2013	1106	Conductors - Overhead	\$367.50
EV2013121551	4/22/2013	1106	Conductors - Overhead	\$285.00
EV2013121552	6/14/2013	1122	Poles & Towers	\$4,685.00
EV2013121555	6/19/2013	1136	Outage	\$0.00
EV2013121557	6/13/2013	1128	Transformer Overhead	\$0.00
EV2013121560	6/23/2013	1128	Transformer Overhead	\$860.00
EV2013121565	5/21/2013	1101	Abnormal Voltage	\$0.00
EV2013121587	6/25/2013	1130	Tree Trimming	\$0.00
EV2013121594	7/9/2013	1128	Transformer Overhead	\$64.31
EV2013121604	7/7/2013	1136	Outage	\$0.00
EV2013121624	5/26/2013	1136	Outage	\$0.00
EV2013121635	6/1/2013	1136	Outage	\$0.00
EV2013121665	5/29/2013	1136	Outage	\$0.00
EV2013121673	6/28/2013	1107	Conductors - Underground	\$0.00
EV2013121674	6/21/2013	1136	Outage	\$0.00
EV2013121680	7/21/2013	1107	Conductors - Underground	\$90.00
EV2013121681	6/26/2013	1134	Work Performed Electrical	\$104.00
EV2013121682	6/26/2013	1107	Conductors - Underground	\$103.80
EV2013121686	7/2/2013	1122	Poles & Towers	\$1,139.46
EV2013121688	7/8/2013	1110	Equipment Failure	\$0.00
EV2013121718	7/2/2013	1128	Transformer Overhead	\$242.58
EV2013121725	7/15/2013	1107	Conductors - Underground	\$0.00
EV2013121725	7/15/2013	1107	Conductors - Underground	\$83.00
EV2013121731	8/3/2013	1108	Contact with Electrical	\$0.00
EV2013121747	7/19/2013	1106	Conductors - Overhead	\$87.75

Event Number	Event Date	Event Cause Code	Event Cause Description	Paid Sum
EV2013121757	7/5/2013	1106	Conductors - Overhead	\$0.00
EV2013121767	7/2/2013	1122	Poles & Towers	\$0.00
EV2013121782	7/20/2013	1101	Abnormal Voltage	\$0.00
EV2013121787	7/13/2013	1106	Conductors - Overhead	\$0.00
EV2013121790	7/22/2013	1101	Abnormal Voltage	\$0.00
EV2013121793	7/11/2013	1106	Conductors - Overhead	\$776.25
EV2013121794	6/3/2013	1110	Equipment Failure	\$0.00
EV2013121841	6/27/2013	1122	Poles & Towers	\$4,831.63
EV2013121842	3/29/2013	1107	Conductors - Underground	\$0.00
EV2013121848	3/25/2013	1110	Equipment Failure	\$0.00
EV2013121862	5/24/2013	1106	Conductors - Overhead	\$0.00
EV2013121869	7/21/2013	1107	Conductors - Underground	\$0.00
EV2013121872	7/6/2013	1106	Conductors - Overhead	\$200.00
EV2013121877	3/2/2013	1107	Conductors - Underground	\$725.00
EV2013121878	7/22/2013	1101	Abnormal Voltage	\$600.00
EV2013121881	7/6/2013	1101	Abnormal Voltage	\$0.00
EV2013121882	8/19/2013	1107	Conductors - Underground	\$3,308.81
EV2013121889	7/8/2013	1136	Outage	\$0.00
EV2013121890	7/26/2013	1136	Outage	\$0.00
EV2013121896	7/12/2013	1110	Equipment Failure	\$39.00
EV2013121898	6/22/2013	1106	Conductors - Overhead	\$6,174.00
EV2013121919	4/22/2013	1131	Vegetation	\$1,895.00
EV2013121926	7/26/2013	1101	Abnormal Voltage	\$0.00
EV2013121927	8/29/2013	1101	Abnormal Voltage	\$0.00
EV2013121932	6/11/2013	1136	Outage	\$0.00
EV2013121935	8/8/2013	1136	Outage	\$1,177.00
EV2013121953	6/20/2013	1131	Vegetation	\$2,639.09
EV2013121955	8/22/2013	1106	Conductors - Overhead	\$0.00
EV2013121987	7/2/2013	1122	Poles & Towers	\$1,064.41
EV2013122006	8/20/2013	1107	Conductors - Underground	\$0.00
EV2013122007	8/20/2013	1122	Poles & Towers	\$312.83
EV2013122009	6/12/2013	1106	Conductors - Overhead	\$2,487.59
EV2013122011	5/13/2013	1101	Abnormal Voltage	\$612.52
EV2013122015	8/6/2013	1101	Abnormal Voltage	\$5,895.20
EV2013122022	7/26/2013	1136	Outage	\$0.00
EV2013122031	6/16/2013	1106	Conductors - Overhead	\$0.00
EV2013122034	7/13/2013	1106	Conductors - Overhead	\$0.00
EV2013122049	8/7/2013	1106	Conductors - Overhead	\$193.36
EV2013122055	7/9/2013	1101	Abnormal Voltage	\$3,301.00
EV2013122058	8/17/2013	1136	Outage	\$0.00
EV2013122063	8/6/2013	1122	Poles & Towers	\$695.00
EV2013122069	7/2/2013	1136	Outage	\$0.00
EV2013122077	9/10/2013	1106	Conductors - Overhead	\$200.00
EV2013122078	8/27/2013	1110	Equipment Failure	\$0.00
EV2013122102	8/16/2013	1136	Outage	\$699.76
EV2013122103	7/18/2013	1101	Abnormal Voltage	\$0.00
EV2013122105	8/15/2013	1107	Conductors - Underground	\$1,628.00
EV2013122114	8/28/2013	1101	Abnormal Voltage	\$487.50
EV2013122117	5/23/2013	1106	Conductors - Overhead	\$1,274.00
EV2013122121	9/6/2013	1136	Outage	\$0.00
EV2013122132	6/12/2013	1136	Outage	\$0.00

Event Number	Event Date	Event Cause Code	Event Cause Description	Paid Sum
EV2013122133	4/29/2013	1134	Work Performed Electrical	\$0.00
EV2013122136	9/18/2013	1136	Outage	\$0.00
EV2013122139	8/10/2013	1107	Conductors - Underground	\$0.00
EV2013122142	6/6/2013	1107	Conductors - Underground	\$0.00
EV2013122143	8/6/2013	1122	Poles & Towers	\$1,080.00
EV2013122151	9/27/2013	1106	Conductors - Overhead	\$0.00
EV2013122152	9/3/2013	1106	Conductors - Overhead	\$160.00
EV2013122200	10/4/2013	1107	Conductors - Underground	\$254.25
EV2013122201	9/13/2013	1106	Conductors - Overhead	\$1,300.00
EV2013122211	10/9/2013	1106	Conductors - Overhead	\$0.00
EV2013122226	8/20/2013	1122	Poles & Towers	\$0.00
EV2013122248	8/24/2013	1106	Conductors - Overhead	\$0.00
EV2013122251	9/6/2013	1127	Tools-Machines-Equip-Contain-non-electric	\$119.66
EV2013122262	9/8/2013	1130	Tree Trimming	\$0.00
EV2013122263	7/1/2013	1106	Conductors - Overhead	\$0.00
EV2013122266	6/16/2013	1106	Conductors - Overhead	\$5,538.10
EV2013122279	10/2/2013	1101	Abnormal Voltage	\$0.00
EV2013122293	10/5/2013	1106	Conductors - Overhead	\$0.00
EV2013122294	9/15/2013	1133	Weather- Damage from	\$0.00
EV2013122296	8/6/2013	1133	Weather- Damage from	\$0.00
EV2013122297	7/19/2013	1107	Conductors - Underground	\$0.00
EV2013122298	8/13/2013	1106	Conductors - Overhead	\$0.00
EV2013122319	8/23/2013	1136	Outage	\$0.00
EV2013122337	7/9/2013	1106	Conductors - Overhead	\$0.00
EV2013122349	10/7/2013	1107	Conductors - Underground	\$0.00
EV2013122352	10/11/2013	1106	Conductors - Overhead	\$0.00
EV2013122367	10/11/2013	1101	Abnormal Voltage	\$170.94
EV2013122369	9/17/2013	1101	Abnormal Voltage	\$299.40
EV2013122370	10/14/2013	1101	Abnormal Voltage	\$0.00
EV2013122406	10/12/2013	1130	Tree Trimming	\$535.00
EV2013122439	10/29/2013	1107	Conductors - Underground	\$0.00
EV2013122443	9/28/2013	1106	Conductors - Overhead	\$0.00
EV2013122448	10/18/2013	1101	Abnormal Voltage	\$2,073.24
EV2013122465	9/4/2013	1136	Outage	\$11,272.82
EV2013122475	9/9/2013	1136	Outage	\$100.00
EV2013122476	10/16/2013	1107	Conductors - Underground	\$0.00
EV2013122477	10/22/2013	1106	Conductors - Overhead	\$287.00
EV2013122481	10/7/2013	1122	Poles & Towers	\$1,498.65
EV2013122484	10/2/2013	1106	Conductors - Overhead	\$0.00
EV2013122486	4/30/2013	1122	Poles & Towers	\$659.56
EV2013122489	7/11/2013	1110	Equipment Failure	\$0.00
EV2013122490	7/26/2013	1110	Equipment Failure	\$0.00
EV2013122507	9/26/2013	1134	Work Performed Electrical	\$100.00
EV2013122509	10/14/2013	1101	Abnormal Voltage	\$0.00
EV2013122547	11/8/2013	1134	Work Performed Electrical	\$298.60
EV2013122575	8/29/2013	1110	Equipment Failure	\$0.00
EV2013122587	8/30/2013	1110	Equipment Failure	\$0.00
EV2013122588	10/5/2013	1128	Transformer Overhead	\$0.00
EV2013122603	11/12/2013	1106	Conductors - Overhead	\$72.00
EV2013122614	9/10/2013	1106	Conductors - Overhead	\$0.00
EV2013122621	6/29/2013	1106	Conductors - Overhead	\$3,680.00

Event Number	Event Date	Event Cause Code	Event Cause Description	Paid Sum
EV2013122637	7/21/2013	1107	Conductors - Underground	\$0.00
EV2013122640	9/28/2013	1106	Conductors - Overhead	\$0.00
EV2013122641	9/20/2013	1107	Conductors - Underground	\$0.00
EV2013122643	1/15/2013	1122	Poles & Towers	\$1,075.00
EV2013122659	9/5/2013	1106	Conductors - Overhead	\$450.22
EV2013122666	12/1/2013	1106	Conductors - Overhead	\$0.00
EV2013122667	9/27/2013	1122	Poles & Towers	\$5,177.08
EV2013122677	9/15/2013	1106	Conductors - Overhead	\$0.00
EV2013122699	8/29/2013	1128	Transformer Overhead	\$0.00
EV2013122768	9/2/2013	1107	Conductors - Underground	\$0.00
EV2013122778	12/29/2013	1106	Conductors - Overhead	\$295.00
EV2013122779	12/2/2013	1107	Conductors - Underground	\$271.25
EV2013122780	12/10/2013	1107	Conductors - Underground	\$0.00
EV2013122799	7/1/2013	1106	Conductors - Overhead	\$4,740.44
EV2013122812	11/13/2013	1128	Transformer Overhead	\$785.80
EV2013122819	11/17/2013	1106	Conductors - Overhead	\$0.00
EV2013122820	7/2/2013	1110	Equipment Failure	\$0.00
EV2013122823	11/7/2013	1107	Conductors - Underground	\$75.00
EV2013122828	4/15/2013	1106	Conductors - Overhead	\$0.00
EV2013122889	12/20/2013	1134	Work Performed Electrical	\$0.00
EV2013122898	9/15/2013	1107	Conductors - Underground	\$251.00
EV2013122904	11/5/2013	1136	Outage	\$0.00
EV2013122916	10/15/2013	1101	Abnormal Voltage	\$0.00
EV2013122936	12/31/2013	1110	Equipment Failure	\$0.00
EV2013122937	11/7/2013	1107	Conductors - Underground	\$926.80
EV2013122938	9/9/2013	1107	Conductors - Underground	\$2,400.00
EV2013122951	8/6/2013	1106	Conductors - Overhead	\$7,615.98
EV2013122956	12/14/2013	1106	Conductors - Overhead	\$14,497.00
EV2013122960	6/22/2013	1101	Abnormal Voltage	\$0.00
EV2013122962	10/22/2013	1122	Poles & Towers	\$442.20
EV2013122981	12/26/2013	1107	Conductors - Underground	\$1,043.91
EV2013123029	11/17/2013	1106	Conductors - Overhead	\$0.00
EV2013123045	12/6/2013	1106	Conductors - Overhead	\$0.00
EV2013123055	12/6/2013	1106	Conductors - Overhead	\$686.80
EV2013123079	6/5/2013	1136	Outage	\$0.00
EV2013123132	12/30/2013	1110	Equipment Failure	\$0.00
EV2013123143	12/30/2013	1110	Equipment Failure	\$0.00

PUBLIC DOCUMENT
SECURITY AND PRIVACY DATA HAVE BEEN EXCISED

Line	Begin Date	Begin Time2	Duration Hrs	Duration Mins	Cause	Comments	Remedial Action
[Security Data Begins						[Security and Privacy Data Begins	
	1/23/2013	15:12	0	22	Other Utility		No Remedial Action by Xcel Energy
			0	25			
			1	6			
	1/28/2013	12:07		50	Other Utility		No Remedial Action by Xcel Energy
	1/31/2013	22:36	4	55	Other Utility		No Remedial Action by Xcel Energy
	3/11/2013	03:13	2	18	Other Utility		No Remedial Action by Xcel Energy
	3/18/2013	06:12	2	9	Other Utility		No Remedial Action by Xcel Energy
	3/21/2013	10:54		25	Switch/MOD Failure		Replace MOD Batteries
				29			
	3/26/2013	22:10	1	32	Conductor Failure		Splice Conductor
	4/14/2013	07:53	1	5	Conductor Contact - Galloping		No Remedial Action by Xcel Energy
	4/15/2013	00:14	1	39	Forced/Planned Outage		No Remedial Action by Xcel Energy
	4/15/2013	19:05		37	Other Utility		No Remedial Action by Xcel Energy
			1	20			

PUBLIC DOCUMENT
SECURITY AND PRIVACY DATA HAVE BEEN EXCISED

Line	Begin Date	Begin Time2	Duration Hrs	Duration Mins	Cause	Comments	Remedial Action
	5/2/2013	05:20	2	33	Unknown		No Remedial Action by Xcel Energy
	5/17/2013	16:13		22	Pole Fire		Poles have been restored
	5/19/2013	17:55	2	5	Pole Broken		No Remedial Action by Xcel Energy
	5/29/2013	00:14	2	12	Animal Contact		Repairs were made
	6/1/2013	19:12	3	28	Unknown		No Remedial Action by Xcel Energy
3			37				
3			50				
	6/20/2013	11:08		57	Insulator Glass/Porc Line		Insulator replaced, line restored
			1	12			
	6/21/2013	02:43		9	Tree in Line		Tree removed. Relay settings adjusted at Quarry.
	6/21/2013	02:44	1	26	Line Equipment Failure		Line restored
	6/21/2013	19:37	1	54	Other Utility		No Remedial Action by Xcel Energy
			1	18			
	7/24/2013	18:08		37	Unknown		No Remedial Action by Xcel Energy
			1	33			
				37			
			1	28			

PUBLIC DOCUMENT
SECURITY AND PRIVACY DATA HAVE BEEN EXCISED

Line	Begin Date	Begin Time2	Duration Hrs	Duration Mins	Cause	Comments	Remedial Action
	7/30/2013	06:24		59	Connector Failure Crimped		Line restored
			1	20			
			1	14			
	8/11/2013	14:46		56	Other Utility		No Remedial Action by Xcel Energy
				6			
	8/16/2013	23:49	1	42	Public Damage Broken Pole		Pole has been replaced.
	8/27/2013	15:31		38	Public Damage Broken Pole		Pole has been replaced.
	10/2/2013	18:51	1	45	Pole Broken		Structures have been restored.
				46			
	10/2/2013	21:33		55	Insulator Glass/Porc Line		Line restored
	10/3/2013	03:08		40	Relay Failure		Relay settings were corrected
	11/8/2013	20:27	1	55	Other Utility		No Remedial Action by Xcel Energy
	12/5/2013	04:07	2	25	Conductor Contact - Galloping		No Remedial Action by Xcel Energy
			3	33			
	12/9/2013	20:40		13	Conductor Contact - Galloping		No Remedial Action by Xcel Energy
				12			
Security Data Ends]						Security and Privacy Data Ends]	

Attachment D

This attachment has been efiled separately due to its voluminous nature.

All Causes,
Distribution Substation,
Transmission Substation, All levels, No "Planned" Cause
and Transmission Line levels Includes Bulk Power Supply
All levels, "Planned" Cause only
Includes Bulk Power Supply

Metro East				All levels, All Causes included			Bulk Power Supply			Unplanned			Planned		
Feeder ID	SAIFI	SAIDI	CAIDI	Outages	Customers Affected	Customer Mins Out	Outages	Customers Affected	Customer Mins Out	Outages	Customers Affected	Customer Mins Out	Outages	Customers Affected	Customer Mins Out
[Security Data Begins]															
1	3.77	703.14	186.61	13	211	39,376	2	118	4,897	12	210	39,215	1	1	161
2	5.33	428.76	80.48	9	309	24,868	0	0	0	9	309	24,868	0	0	0
3	3.24	418.55	129.17	28	5,745	742,088	0	0	0	23	5,677	738,212	5	68	3,876
4	5.17	393.66	76.15	19	2,471	188,170	1	1,579	132,636	17	2,463	187,489	2	8	681
5	0.29	378.55	1,319.00	9	64	84,416	0	0	0	6	50	13,409	3	14	71,007
6	1.11	352.41	318.28	63	1,817	578,309	0	0	0	48	1,690	570,002	15	127	8,307
7	2.65	336.43	127.01	21	4,299	546,028	1	1,628	91,168	19	4,288	545,357	2	11	671
8	0.08	310.79	4,125.00	1	11	45,375	0	0	0	1	11	45,375	0	0	0
9	2.77	301.16	108.75	18	612	66,557	0	0	0	18	612	66,557	0	0	0
10	1.12	251.28	224.43	11	552	123,883	0	0	0	11	552	123,883	0	0	0
11	1.79	242.22	134.97	45	1,922	259,417	0	0	0	40	1,721	252,331	5	201	7,086
12	2.14	237.36	110.71	37	4,363	483,032	0	0	0	24	4,298	479,159	13	65	3,873
13	2.62	235.22	89.92	54	4,222	379,646	1	2,956	248,304	41	3,694	341,232	13	528	38,414
14	3.00	234.19	78.06	5	78	6,089	0	0	0	5	78	6,089	0	0	0
15	2.35	233.44	99.37	9	639	63,495	1	275	1,650	4	599	59,084	5	40	4,411
16	0.90	216.67	240.22	4	46	11,050	0	0	0	4	46	11,050	0	0	0
17	1.06	215.09	203.54	8	149	30,328	0	0	0	8	149	30,328	0	0	0
18	3.64	204.70	56.20	20	8,669	487,196	1	3,348	36,828	16	8,633	486,344	4	36	852
19	1.44	201.93	140.01	120	4,305	602,754	0	0	0	50	3,689	533,840	70	616	68,914
20	1.97	198.19	100.78	44	4,946	498,453	0	0	0	37	4,518	491,545	7	428	6,908
21	0.68	187.98	275.53	42	1,589	437,815	0	0	0	32	1,474	434,015	10	115	3,800
22	2.06	182.68	88.49	6	3,144	278,215	1	1,527	10,689	6	3,144	278,215	0	0	0
23	2.30	182.58	79.21	12	892	70,658	2	747	44,468	10	825	69,509	2	67	1,149
24	1.09	181.75	166.97	12	824	137,584	0	0	0	10	822	137,091	2	2	493
25	0.56	180.94	320.33	43	1,546	495,237	0	0	0	30	1,429	474,236	13	117	21,001

(1) Based on Jan 1-Dec 31, year-end storm normalized data

"Total" includes all causes, all levels

"Bulk Power Supply" includes Distribution Substation, Transmission Substation, and Transmission Line levels, all cause codes

"Unplanned" includes all levels and no outages with a primary cause code of "Intentional/Planned", Includes Bulk Power Supply outages

"Planned" includes all levels and only outages with a primary cause code of "Intentional/Planned", Includes Bulk Power Supply outages

Metro East Poor Performing Feeders (2)

Based on performance Sept 2012 to Aug 2013

Feeder ID	SAIFI	SAIDI	CAIDI	Reasons for Poor Performance	Operational Changes Made, Considering or Planned
1.83	1,540.41	841.75		Vegetation and storms	Additional tree trimming is being considered
2.35	666.62	283.67		Vegetation and storms	Additional trimming and add fault indicators
4.79	380.53	79.44		Underground cable failure	Replace feeder cable from substation to 12-LOK083
4.11	2,667.71	649.08		Underground cable and veg issues	Repair pole, add arresters, and add load center
3.34	734.91	220.03		Connector failure and vegetation	Reconductor overhead facilities and upgrade poles

[Security Data Ends]

(2) Distribution outages only, storms are included

Metro West				All levels, All Causes included			All Causes, Distribution Substation, Transmission Substation, and Transmission Line levels			All levels, No "Planned" Cause Includes Bulk Power Supply			All levels, "Planned" Cause Includes Bulk Power Supply			
Feeder ID	SAIFI	SAIDI	CAIDI	Total			Bulk Power Supply			Unplanned			Planned			
				Outages	Customers Affected	Customer Mins Out	Outages	Customers Affected	Customer Mins Out	Outages	Customers Affected	Customer Mins Out	Outages	Customers Affected	Customer Mins Out	
[Security Data Begins																
1	1.58	509.23	322.93	6	41	13,240	0	0	0	6	41	13,240	0	0	0	0
2	1.02	504.83	492.86	3	253	124,693	0	0	0	3	253	124,693	0	0	0	0
3	3.42	483.61	141.35	37	7,866	1,111,825	0	0	0	26	7,803	1,107,379	11	63	4,446	0
4	4.18	459.23	109.88	16	2,867	315,031	0	0	0	12	2,502	222,298	4	365	92,733	0
5	1.15	424.04	368.57	29	688	253,573	0	0	0	18	572	247,992	11	116	5,581	0
6	2.71	388.30	143.34	31	4,058	581,668	0	0	0	27	3,986	577,193	4	72	4,475	0
7	1.59	387.72	243.12	34	2,491	605,617	0	0	0	33	2,485	603,547	1	6	2,070	0
8	2.75	364.92	132.49	59	3,407	451,408	0	0	0	46	3,322	440,591	13	85	10,817	0
9	3.15	349.22	110.92	51	3,926	435,473	0	0	0	41	3,870	432,386	10	56	3,087	0
10	2.01	316.27	157.51	58	763	120,184	1	379	58,745	14	248	33,920	44	515	86,264	0
11	2.57	303.97	118.26	111	9,310	1,100,968	1	3,650	255,500	105	7,160	867,798	6	2,150	233,170	0
12	3.88	288.17	74.28	18	1,804	134,000	0	0	0	15	1,784	133,332	3	20	668	0
13	3.19	287.30	90.08	5	118	10,630	0	0	0	0	0	0	5	118	10,630	0
14	2.08	280.62	135.05	25	2,589	349,647	0	0	0	20	2,558	345,456	5	31	4,191	0
15	1.95	275.38	141.22	10	195	27,538	0	0	0	9	194	27,093	1	1	445	0
16	2.11	274.95	130.24	8	361	47,017	0	0	0	8	361	47,017	0	0	0	0
17	1.04	272.67	263.04	12	935	245,947	0	0	0	11	932	245,812	1	3	135	0
18	1.84	266.48	144.87	18	2,086	302,191	0	0	0	16	2,055	300,376	2	31	1,815	0
19	2.02	264.56	131.01	40	4,919	644,459	0	0	0	33	4,894	642,763	7	25	1,696	0
20	2.38	258.22	108.61	15	699	75,916	1	293	22,854	13	690	73,300	2	9	2,616	0
21	0.95	256.84	270.25	22	1,398	377,811	0	0	0	18	1,394	377,378	4	4	433	0
22	2.63	256.68	97.48	51	5,490	535,187	0	0	0	38	5,152	471,435	13	338	63,752	0
23	1.89	255.96	135.54	18	914	123,883	0	0	0	15	598	91,737	3	316	32,146	0
24	0.71	255.00	357.00	1	15	5,355	0	0	0	1	15	5,355	0	0	0	0
25	2.06	252.06	122.13	116	9,405	1,148,646	0	0	0	77	8,995	1,121,391	39	410	27,255	0

(1) Based on Jan 1-Dec 31, year-end storm normalized data

"Total" includes all causes, all levels

"Bulk Power Supply" includes Distribution Substation, Transmission Substation, and Transmission Line levels, all cause codes

"Unplanned" includes all levels and no outages with a primary cause code of "Intentional", Includes Bulk Power Supply outages

"Planned" includes all levels and only outages with a primary cause code of "Intentional", Includes Bulk Power Supply outages

Metro West Poor Performing Feeders (2)

Based on performance Sept 2012 to Aug 2013

Feeder ID	SAIFI	SAIDI	CAIDI	Reasons for Poor Performance	Operational Changes Made, Considering or Planned
2.51	4,402.67	1,754.05		Vegetation contact	Additional trimming in 2014
2.54	784.47	308.85		Vegetation and cable failure	Replace multiple spans of tap level cable
3.12	671.87	215.34		Connector failure and vegetation	Reconductor multiple spans to remove auto splices
2.96	1,534.59	518.44		Underground cable failure and storm	Replace headend feeder cable from sub to 1-
4.24	1,715.70	404.65		Conductor contact	Reconductor 3000' to address brittle/sagging

Security Data Ends]

				All levels, All Causes included			All Causes, Distribution Substation, Transmission Substation, and Transmission Line levels			All levels, No "Planned" Cause Includes Bulk Power Supply			All levels, "Planned" Cause only Includes Bulk Power Supply		
Northwest				Total			Bulk Power Supply			Unplanned			Planned		
Feeder ID	SAIFI	SAIDI	CAIDI	Outages	Customers Affected	Customer Mins Out	Outages	Customers Affected	Customer Mins Out	Outages	Customers Affected	Customer Mins Out	Outages	Customers Affected	Customer Mins Out
[Security Data Begins]															
1	2.95	828.73	280.88	5	655	183,977	1	261	159,852	4	315	109,347	1	340	74,630
2	1.96	713.17	364.00	12	1,587	577,668	2	863	542,964	10	515	333,252	2	1,072	244,416
3	2.68	485.45	181.30	50	656	118,935	1	248	5,456	8	532	105,208	42	124	13,727
4	2.94	409.01	139.17	16	2,889	402,061	1	982	142,390	14	2,878	400,666	2	11	1,395
5	2.35	407.57	173.66	7	115	19,971	1	48	14,160	5	52	14,733	2	63	5,238
6	1.41	388.86	275.41	8	970	267,148	0	0	0	7	955	263,398	1	15	3,750
7	3.12	377.69	120.90	20	3,952	477,780	2	2,515	105,749	20	3,952	477,780	0	0	0
8	2.32	352.65	151.92	17	448	68,062	1	193	7,334	17	448	68,062	0	0	0
9	4.27	333.79	78.15	31	4,079	318,766	2	1,913	120,570	31	4,079	318,766	0	0	0
10	3.86	329.67	85.50	19	7,523	643,190	0	0	0	18	7,515	642,150	1	8	1,040
11	2.10	320.76	152.78	15	2,555	390,364	0	0	0	14	2,522	388,054	1	33	2,310
12	4.05	283.87	70.06	17	3,063	214,602	2	1,506	18,825	16	2,397	144,241	1	666	70,361
13	1.48	271.51	183.84	3	96	17,648	1	65	13,845	3	96	17,648	0	0	0
14	1.28	209.00	162.72	29	989	160,927	0	0	0	26	584	156,866	3	405	4,061
15	2.01	198.88	98.75	21	1,299	128,279	1	643	63,657	20	1,292	127,089	1	7	1,190
16	1.10	194.99	177.12	4	371	65,712	0	0	0	2	47	4,404	2	324	61,308
17	2.66	194.02	72.98	20	1,175	85,756	2	878	10,975	19	1,169	85,414	1	6	342
18	2.23	182.93	82.09	18	1,210	99,334	0	0	0	16	724	78,610	2	486	20,724
19	2.24	176.40	78.86	9	255	20,110	1	122	4,514	6	129	5,556	3	126	14,554
20	1.29	169.29	131.62	42	4,399	578,988	0	0	0	37	4,244	570,186	5	155	8,802
21	1.11	153.94	138.55	4	40	5,542	1	35	4,515	4	40	5,542	0	0	0
22	2.00	146.00	73.00	2	38	2,774	2	38	2,774	2	38	2,774	0	0	0
23	1.17	140.93	119.97	27	1,910	229,151	1	1,615	164,730	24	1,712	179,378	3	198	49,773
24	2.08	134.98	65.01	6	1,277	83,015	2	1,229	58,914	6	1,277	83,015	0	0	0
25	0.99	128.29	129.00	1	539	69,531	1	539	69,531	1	539	69,531	0	0	0

(1) Based on Jan 1-Dec 31, year-end storm normalized data

"Total" includes all causes, all levels

"Bulk Power Supply" includes Distribution Substation, Transmission Substation, and Transmission Line levels, all cause codes

"Unplanned" includes all levels and no outages with a primary cause code of "Intentional", Includes Bulk Power Supply outages

"Planned" includes all levels and only outages with a primary cause code of "Intentional", Includes Bulk Power Supply outages

Northwest MN Poor Performing Feeders (2)

Based on performance Sept 2012 to Aug 2013

Feeder ID	SAIFI	SAIDI	CAIDI	Reasons for Poor Performance	Operational Changes Made, Considering or Planned
	2.95	2,552.21	865.16	Vegetation and cable failure	Rebuilt overhead and repaired cable
	1.46	612.62	419.60	Vegetation and pole fire	Rebuilt overhead and addressed pole issue
	1.91	1,307.15	684.37	Vegetation and connector failure	Rebuilt overhead and reconducted spans
	1.94	926.68	477.67	Vegetation during storm	Overhead rebuilt
	0.89	2796.05	3141.63	Vegetation during storm	Overhead rebuilt

[Security Data Ends]

(2) Distribution outages only, storms are included

All Causes,
Distribution Substation,
Transmission Substation,
and Transmission Line levels

All levels, All Causes included

All levels, No "Planned" Cause
Includes Bulk Power Supply

All levels, "Planned" Cause only
Includes Bulk Power Supply

Southeast				Total			Bulk Power Supply			Unplanned			Planned		
Feeder ID	SAIFI	SAIDI	CAIDI	Outages	Customers Affected	Customer Mins Out	Outages	Customers Affected	Customer Mins Out	Outages	Customers Affected	Customer Mins Out	Outages	Customers Affected	Customer Mins Out
[Security Data Begins]															
1	2.72	3,418.28	1,254.62	3	455	570,853	0	0	0	3	455	570,853	0	0	0
2	2.69	1,581.48	586.88	12	512	300,481	1	188	68,620	12	512	300,481	0	0	0
3	4.08	1,158.19	283.64	9	686	194,576	1	166	60,590	9	686	194,576	0	0	0
4	2.84	1,065.49	374.74	29	2,903	1,087,867	0	0	0	27	1,822	929,447	2	1,081	158,420
5	2.20	1,029.80	468.66	31	1,804	845,466	0	0	0	30	1,712	832,402	1	92	13,064
6	3.35	604.63	180.56	15	1,959	353,710	2	402	46,431	13	1,352	322,585	2	607	31,125
7	1.39	495.52	356.69	13	464	165,505	0	0	0	12	130	45,933	1	334	119,572
8	1.05	452.59	429.18	4	58	24,892	0	0	0	4	58	24,892	0	0	0
9	1.93	420.47	218.14	24	1,650	359,925	1	855	117,990	23	1,649	359,907	1	1	18
10	2.91	384.04	131.75	0	137	18,050	0	92	11,030	0	137	18,050	0	0	0
11	0.88	361.02	411.00	13	549	225,638	0	0	0	13	549	225,638	0	0	0
12	1.11	299.47	270.50	13	734	198,550	0	0	0	13	734	198,550	0	0	0
13	2.14	294.01	137.15	9	358	49,100	1	168	10,080	7	356	48,975	2	2	125
14	0.20	284.16	1,396.25	10	81	113,096	0	0	0	8	61	107,378	2	20	5,718
15	0.94	280.23	299.06	17	878	262,579	0	0	0	15	845	260,719	2	33	1,860
16	1.52	271.71	178.85	10	1,621	289,919	1	1,077	183,090	10	1,621	289,919	0	0	0
17	1.79	253.80	141.85	35	3,142	445,680	1	1,752	231,264	33	2,873	400,830	2	269	44,850
18	1.28	238.84	186.63	17	1,043	194,657	1	823	171,184	6	941	185,302	11	102	9,355
19	1.00	230.53	229.52	2	229	52,561	1	228	52,440	2	229	52,561	0	0	0
20	1.06	223.93	211.02	14	1,596	336,793	1	1,516	328,972	14	1,596	336,793	0	0	0
21	1.96	219.59	112.09	18	954	106,938	1	496	25,792	10	898	101,399	8	56	5,539
22	1.22	215.07	176.53	15	1,384	244,320	1	1,151	196,821	15	1,384	244,320	0	0	0
23	4.04	206.58	51.17	12	3,698	189,227	1	916	34,808	8	3,673	185,418	4	25	3,809
24	1.10	204.07	186.20	13	1,987	369,984	1	1,803	342,570	13	1,987	369,984	0	0	0
25	1.09	192.71	177.31	15	1,189	210,822	1	1,098	187,758	14	1,167	207,082	1	22	3,740

(1) Based on Jan 1-Dec 31, year-end storm normalized data

"Total" includes all causes, all levels

"Bulk Power Supply" includes Distribution Substation, Transmission Substation, and Transmission Line levels, all cause codes

"Unplanned" includes all levels and no outages with a primary cause code of "Intentional", Includes Bulk Power Supply outages

"Planned" includes all levels and only outages with a primary cause code of "Intentional", Includes Bulk Power Supply outages

Southeast MN Poor Performing Feeders (2)

Based on performance Sept 2012 to Aug 2013

Feeder ID	SAIFI	SAIDI	CAIDI	Reasons for Poor Performance	Operational Changes Made, Considering or Planned
	3.53	403.99	114.44	Vegetation and cable failure	Reconductor OH, add switches and fault indicators
	3.80	957.91	252.08	Vegetation and cable failure	Install additional fusing and replace cable
[Security Data Ends]					

(2) Distribution outages only, storms are included

A. The number and percentage of customer meters read by utility personnel (Company).

	Residential	Commercial	Industrial	Other	Total	Total Of All Readings	Percent Read by Utility (Company)
JANUARY	1,683,321	167,666	9,674	4,788	1,865,449	1,879,001	99.28%
FEBRUARY	1,489,233	151,645	9,067	4,426	1,654,371	1,665,981	99.30%
MARCH	1,487,585	154,167	9,313	4,439	1,655,504	1,667,755	99.27%
APRIL	1,632,407	166,110	9,892	4,871	1,813,280	1,825,503	99.33%
MAY	1,563,972	155,587	9,226	4,522	1,733,307	1,749,121	99.10%
JUNE	1,567,191	160,480	9,563	4,665	1,741,899	1,760,869	98.92%
JULY	1,638,131	165,313	9,680	4,752	1,817,876	1,839,320	98.83%
AUGUST	1,583,946	156,824	9,355	4,621	1,754,746	1,775,288	98.84%
SEPTEMBER	1,569,269	160,800	9,511	4,662	1,744,242	1,760,551	99.07%
OCTOBER	1,708,418	170,140	9,705	4,905	1,893,168	1,908,393	99.20%
NOVEMBER	1,372,059	143,947	8,849	4,255	1,529,110	1,543,028	99.10%
DECEMBER	1,494,394	152,133	8,850	4,361	1,659,738	1,673,375	99.19%

B. The number and percentage of customer meters read by customers.

	Residential	Commercial	Industrial	Other	Total	Total Of All Readings	Percent Read by Customer
JANUARY	23	3			26	1,879,001	0.00001%
FEBRUARY	20	4			24	1,665,981	0.00001%
MARCH	23	3			26	1,667,755	0.00001%
APRIL	15	1			16	1,825,503	0.00001%
MAY	18	4	2		24	1,749,121	0.00001%
JUNE	39	1			40	1,760,869	0.00002%
JULY	41	1	1		43	1,839,320	0.00002%
AUGUST	30	1	1		32	1,775,288	0.00001%
SEPTEMBER	25	1			26	1,760,551	0.00001%
OCTOBER	11	1	1		13	1,908,393	0.00001%
NOVEMBER	13	2			15	1,543,028	0.00001%
DECEMBER	14	1			15	1,673,375	0.00001%

C-1. The number and percentage of customer meters that have not been read by utility personnel for periods of six to 12 months and an explanation as to why they have not been read.

Account Class: Residential

Message	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	Percent
NO READING RETURNED	240	206	179	180	84	31	44	41	57	43	65	108	1278	49.15%
NO ANSWER	32	31	36	22	42	48	26	24	21	25	23	18	348	13.38%
DOOR LOCKED	28	20	24	23	27	20	19	13	12	11	15	8	220	8.46%
OC Meter Maint	34	54	35	21	10	0	1	1	0	1	1	1	159	6.12%
METER OFF	4	6	6	7	18	20	16	17	7	10	9	11	131	5.04%
VACANT	8	6	5	12	5	9	4	7	10	4	3	6	79	3.04%
NEED KEY OR CODE	20	4	3	1	6	11	2	1	1	1	2	15	67	2.58%
SERVICE CUT AT POLE	8	8	8	3	6	4	3	3	3	9	4	7	66	2.54%
KEY NOT AVAILABLE	7	0	1	2	4	11	4	8	3	3	5	2	50	1.92%
BAD KEY OR CODE	2	4	8	2	3	2	3	4	2	4	5	6	45	1.73%
DEAD REGISTER	5	5	3	1	6	2	1	2	2	1	1	1	30	1.15%
GATE PROBLEM	7	3	2	1	1	1	1	3	1	1	1	2	24	0.92%
CUSTOMER READING	1	2	1	1	2	1	1	1	1	1	4	1	17	0.65%
CUST REQUESTS SKIP	0	0	0	0	0	4	2	2	1	3	0	1	13	0.50%
DOG	1	2	0	2	1	1	0	0	2	2	1	0	12	0.46%
METER REMOVED	3	0	1	1	2	1	0	0	0	0	2	1	11	0.42%
SEASONAL	1	2	3	3	0	0	0	0	0	0	1	0	10	0.38%
METER BLOCKED	1	1	1	1	0	0	0	0	0	2	1	2	9	0.35%
UNSAFE CONDITION	3	0	1	0	1	2	1	0	0	1	0	0	9	0.35%
BAD ROAD	1	0	3	0	1	0	0	0	0	0	0	0	5	0.19%
HANDHELD ESTIMATE	0	0	0	0	0	1	0	0	1	1	1	1	5	0.19%
REFUSED ADMITTANCE	0	1	0	0	0	0	1	0	0	1	0	0	3	0.12%
METER WILL NOT PROBE	0	0	0	1	1	0	0	0	0	0	0	0	2	0.08%
SNOW/MUD	0	1	1	0	0	0	0	0	0	0	0	0	2	0.08%
EMED Data Corrupt	0	0	0	0	0	0	0	0	0	0	0	1	1	0.04%
EMED Meter Maint	0	0	0	0	1	0	0	0	0	0	0	0	1	0.04%
LEFT CARD	0	0	0	0	0	0	0	0	0	1	0	0	1	0.04%
OC CellNet New: no premise ID	0	0	0	0	0	0	0	0	0	0	0	1	1	0.04%
SPS DEAD REGISTER	0	0	0	0	0	0	0	0	0	0	1	0	1	0.04%
TOTAL	406	356	321	284	221	169	129	127	124	125	145	193	2600	100%

C-1. The number and percentage of customer meters that have not been read by utility personnel for periods of six to 12 months and an explanation as to why they have not been read.

Account Class: Commercial

Message	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	Percent
NO READING RETURNED	45	44	45	51	22	13	27	6	12	18	18	30	331	40.27%
METER OFF	4	7	5	8	11	12	9	8	7	5	8	11	95	11.56%
VACANT	7	3	4	6	5	6	1	7	5	8	5	7	64	7.79%
NO ANSWER	8	3	3	0	9	13	4	5	0	3	3	2	53	6.45%
SEASONAL	1	4	2	3	1	4	4	4	3	3	3	5	37	4.50%
DOOR LOCKED	6	4	2	8	4	5	3	1	0	2	0	1	36	4.38%
SERVICE CUT AT POLE	1	3	1	3	6	3	1	3	5	4	2	2	34	4.14%
DEAD REGISTER	4	3	4	1	4	1	4	1	0	1	2	6	31	3.77%
BAD KEY OR CODE	0	2	2	1	3	4	0	1	1	1	0	2	17	2.07%
GATE PROBLEM	1	1	2	1	2	2	2	1	0	0	2	1	15	1.82%
OC Meter Maint	2	5	4	2	1	0	1	0	0	0	0	0	15	1.82%
METER REMOVED	3	0	0	2	3	2	0	0	0	1	2	1	14	1.70%
CANNOT LOCATE	2	0	0	0	4	1	0	1	0	1	0	3	12	1.46%
NEED KEY OR CODE	1	2	1	2	1	1	1	0	1	0	0	0	10	1.22%
UNSAFE CONDITION	1	1	1	2	1	2	0	1	0	0	0	0	9	1.09%
HANDHELD ESTIMATE	1	1	1	1	1	0	0	0	1	1	1	0	8	0.97%
KEY NOT AVAILABLE	2	0	0	0	0	2	1	0	0	2	0	1	8	0.97%
CUST REQUESTS SKIP	1	2	0	0	2	0	0	0	1	1	0	0	7	0.85%
CUSTOMER READING	1	0	0	0	1	1	0	1	0	0	1	0	5	0.61%
METER WILL NOT PROBE	0	0	0	0	0	0	2	2	0	0	0	0	4	0.49%
BAD ROAD	1	1	1	0	0	0	0	0	0	0	0	0	3	0.36%
METER BLOCKED	0	0	1	1	0	1	0	0	0	0	0	0	3	0.36%
ABS Data Corrupt - MCC	0	0	0	0	1	1	0	0	0	0	0	0	2	0.24%
ABS MCC Calc Reading	0	0	0	0	2	0	0	0	0	0	0	0	2	0.24%
REFUSED ADMITTANCE	0	0	0	0	0	0	0	1	1	0	0	0	2	0.24%
WRONG ROUTE	0	1	0	0	0	0	0	0	0	0	1	0	2	0.24%
ABS Stale Reads - MCC	0	0	0	0	0	0	0	0	0	0	0	1	1	0.12%
Bad Ert	0	0	0	0	0	0	1	0	0	0	0	0	1	0.12%
SNOW/MUD	0	0	1	0	0	0	0	0	0	0	0	0	1	0.12%
TOTAL	92	87	80	92	84	74	61	43	37	51	48	73	822	100%

C-1. The number and percentage of customer meters that have not been read by utility personnel for periods of six to 12 months and an explanation as to why they have not been read.

Account Class: Industrial

Message

NO READING RETURNED	9	10	12	10	11	11	14	10	12	3	4	7	113	63.84%
SEASONAL	3	3	0	4	3	3	0	3	0	4	1	3	27	15.25%
METER OFF	0	1	1	1	3	3	1	1	0	1	1	1	14	7.91%
METER WILL NOT PROBE	3	2	2	2	2	0	1	0	0	0	0	0	12	6.78%
METER REMOVED	0	0	0	0	1	0	1	1	0	1	0	0	4	2.26%
VACANT	1	1	1	1	0	0	0	0	0	0	0	0	4	2.26%
DEAD REGISTER	0	0	0	1	0	1	0	0	0	0	0	0	2	1.13%
NO ANSWER	0	0	0	0	0	1	0	0	0	0	0	0	1	0.56%
TOTAL	16	17	16	19	20	19	17	15	12	9	6	11	177	100%

C-1. The number and percentage of customer meters that have not been read by utility personnel for periods of six to 12 months and an explanation as to why they have not been read.

Account Class: Other

Message

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	Percent
NO READING RETURNED	5	5	4	6	5	6	6	5	6	5	5	6	64	81.01%
CUST REQUESTS SKIP	0	1	0	1	1	1	0	1	1	1	0	0	7	8.86%
CUSTOMER READING	1	0	1	0	0	0	1	0	0	0	1	1	5	6.33%
METER REMOVED	0	0	0	0	0	1	0	0	0	0	1	0	2	2.53%
WRONG ROUTE	0	0	0	0	0	0	0	1	0	0	0	0	1	1.27%
TOTAL	6	6	5	7	6	8	7	7	7	6	7	7	79	100%

C-2. The number and percentage of customer meters that have not been read by utility personnel for periods of longer than 12 months and an explanation as to why they have not been read.

Account Class: Residential

Message	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	Percent
NO READING RETURNED	30	23	21	26	18	6	12	11	22	10	12	15	206	34.22%
DOOR LOCKED	14	11	11	11	14	11	15	13	5	1	3	0	109	18.11%
NO ANSWER	6	5	7	7	17	21	9	11	6	8	5	2	104	17.28%
VACANT	4	3	3	5	4	6	4	5	6	4	1	1	46	7.64%
OC Meter Maint	4	5	7	10	3	0	1	0	0	1	0	0	31	5.15%
METER OFF	1	3	2	1	3	3	2	2	3	5	3	2	30	4.98%
SERVICE CUT AT POLE	1	1	1	0	0	0	1	1	0	6	1	2	14	2.33%
CUSTOMER READING	0	2	1	1	2	1	1	1	1	1	1	1	13	2.16%
KEY NOT AVAILABLE	1	0	0	1	0	6	1	1	0	0	1	0	11	1.83%
CUST REQUESTS SKIP	0	0	0	0	0	2	2	1	1	2	0	1	9	1.50%
NEED KEY OR CODE	0	0	0	0	1	2	1	0	1	1	0	0	6	1%
DEAD REGISTER	2	1	0	0	0	0	0	0	0	0	1	0	4	0.66%
SEASONAL	0	1	2	1	0	0	0	0	0	0	0	0	4	0.66%
BAD ROAD	0	0	2	0	1	0	0	0	0	0	0	0	3	0.50%
GATE PROBLEM	0	0	0	1	1	0	1	0	0	0	0	0	3	0.50%
METER BLOCKED	1	1	1	0	0	0	0	0	0	0	0	0	3	0.50%
BAD KEY OR CODE	0	0	0	0	1	0	0	0	0	0	1	0	2	0.33%
UNSAFE CONDITION	0	0	0	0	0	1	1	0	0	0	0	0	2	0.33%
OC CellNet New: no premise ID	0	0	0	0	0	0	0	0	0	0	0	1	1	0.17%
REFUSED ADMITTANCE	0	0	0	0	0	0	0	0	0	1	0	0	1	0.17%
TOTAL	64	56	58	64	65	59	51	46	45	40	29	25	602	100%

C-2. The number and percentage of customer meters that have not been read by utility personnel for periods of longer than 12 months and an explanation as to why they have not been read.

Account Class: Commercial

Message	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	Percent
NO READING RETURNED	16	15	12	20	12	9	17	4	7	8	4	5	129	38.51%
VACANT	3	3	3	5	4	4	0	6	5	6	5	5	49	14.63%
METER OFF	2	4	3	3	2	4	5	4	5	1	4	3	40	11.94%
SEASONAL	1	3	2	1	1	2	2	2	1	1	1	3	20	5.97%
DOOR LOCKED	3	2	1	2	3	2	2	1	0	0	0	1	17	5.07%
SERVICE CUT AT POLE	1	0	0	1	1	2	1	2	2	3	2	2	17	5.07%
NO ANSWER	1	0	0	0	0	5	2	2	0	1	0	1	12	3.58%
DEAD REGISTER	2	1	2	0	0	0	0	0	0	1	1	1	8	2.39%
UNSAFE CONDITION	1	1	1	2	1	1	0	1	0	0	0	0	8	2.39%
GATE PROBLEM	0	0	1	1	2	0	2	0	0	0	1	0	7	2.09%
CUST REQUESTS SKIP	0	2	0	0	1	0	0	0	1	0	0	0	4	1.19%
KEY NOT AVAILABLE	0	0	0	0	0	1	1	0	0	2	0	0	4	1.19%
OC Meter Maint	0	2	2	0	0	0	0	0	0	0	0	0	4	1.19%
BAD KEY OR CODE	0	0	0	0	0	1	0	1	1	0	0	0	3	0.90%
CANNOT LOCATE	1	0	0	0	2	0	0	0	0	0	0	0	3	0.90%
CUSTOMER READING	0	0	0	0	1	0	0	1	0	0	1	0	3	0.90%
HANDHELD ESTIMATE	0	1	1	1	0	0	0	0	0	0	0	0	3	0.90%
NEED KEY OR CODE	0	0	1	1	0	0	0	0	0	0	0	0	2	0.60%
BAD ROAD	0	0	1	0	0	0	0	0	0	0	0	0	1	0.30%
METER BLOCKED	0	0	0	0	0	1	0	0	0	0	0	0	1	0.30%
TOTAL	31	34	30	37	30	32	32	24	22	23	19	21	335	100%

C-2. The number and percentage of customer meters that have not been read by utility personnel for periods of longer than 12 months and an explanation as to why they have not been read.

Account Class: Industrial

Message	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	Percent
NO READING RETURNED	9	9	12	9	9	9	12	9	10	3	4	5	100	76.34%
SEASONAL	3	3	0	3	3	3	0	3	0	4	1	3	26	19.85%
METER OFF	0	0	0	0	0	0	0	0	0	1	1	1	3	2.29%
VACANT	0	0	1	1	0	0	0	0	0	0	0	0	2	1.53%
TOTAL	12	12	13	13	12	12	12	12	10	8	6	9	131	100%

C-2. The number and percentage of customer meters that have not been read by utility personnel for periods of longer than 12 months and an explanation as to why they have not been read.

Account Class: Other

Message	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	Percent
NO READING RETURNED	5	5	4	5	4	4	4	4	4	4	4	5	52	81.25%
CUST REQUESTS SKIP	0	1	0	1	1	1	0	1	1	1	0	0	7	10.94%
CUSTOMER READING	1	0	1	0	0	0	1	0	0	0	1	1	5	7.81%
TOTAL	6	6	5	6	5	5	5	5	5	5	5	6	64	100%

D. Total number of meters installed by month.

	Residential	Commercial	Industrial	Other	Total
JANUARY	1,528,884	157,175	9,799	4,984	1,700,842
FEBRUARY	1,529,286	157,205	9,793	4,982	1,701,266
MARCH	1,529,656	157,232	9,788	4,977	1,701,653
APRIL	1,530,389	157,213	9,780	4,977	1,702,359
MAY	1,531,249	157,265	9,769	4,972	1,703,255
JUNE	1,532,153	157,305	9,758	4,972	1,704,188
JULY	1,533,505	157,359	9,744	4,972	1,705,580
AUGUST	1,534,955	157,459	9,739	4,971	1,707,124
SEPTEMBER	1,535,988	157,612	9,731	4,966	1,708,297
OCTOBER	1,537,717	157,837	9,719	4,969	1,710,242
NOVEMBER	1,539,086	158,063	9,690	4,971	1,711,810
DECEMBER	1,540,064	158,264	9,680	4,972	1,712,980

R=Residential
C=Commercial

	Jan-13		Feb-13		Mar-13		Apr-13		May-13		Jun-13		Jul-13		Aug-13		Sep-13		Oct-13		Nov-13		Dec-13		Total 2013			
	R	C	R	C	R	C	R	C	R	C	R	C	R	C	R	C	R	C	R	C	R	C	R	C	R	C		
Number of customers who received disconnect notices ¹	98,128	4,702	96,137	2,039	106,092	10,264	105,733	1,078	99,860	4,358	91,796	9,655	96,863	390	114,264	9,427	104,816	1,529	121,924	5,849	90,722	9,054	90,714	824	1,217,049	59,169		
Number of customers who sought cold weather rule protection ^{1,2}																												
Sought	14,349	0	12,870	0	15,802	0	35,067	0	0	0	0	0	0	0	0	0	0	0	0	18,561	0	18,014	0	11,814	0	126,477	0	
Granted	14,349	0	12,870	0	15,802	0	35,067	0	0	0	0	0	0	0	0	0	0	0	0	18,561	0	18,014	0	11,814	0	126,477	0	
Number of customers locked for nonpayment	1,020	36	1,070	47	1,079	37	1,753	86	4,411	105	3,031	51	3,299	97	2,601	52	2,810	62	1,048	58	697	30	674	15	23,493	676		
Number of total customers restored to service within 24 hours	592	8	583	10	631	11	802	11	1,384	11	985	3	1,078	8	905	7	1,038	11	489	11	358	6	376	2	9,221	99		
Number of customers restored to service with pay arrangements	29	0	24	0	44	0	90	0	204	0	91	0	126	0	59	0	88	0	52	0	38	0	37	0	882	0		
Number of customers requesting emergency medical account status																												
Requested	74	0	94	0	114	0	143	0	132	0	112	0	182	0	142	0	177	0	201	0	119	0	72	0	1,562			
Denied ³	19	0	36	0	57	0	63	0	73	0	51	0	70	0	67	0	92	0	117	0	60	0	25	0	730			

1 The data for customers receiving disconnect notices and seeking cold weather rule protection represents a combination of gas and electric customers. Approximately 94% of Xcel Energy's Minnesota customers are electric or combined gas and electric customers. For those customers receiving gas and electric service, the disconnect is due to the total amount of regulated charges overdue. Thus the ability to track disconnects due to electric non-payment would be difficult since Xcel Energy's customer service system does not have the functionality to sort the data in this manner.

2 Due to changes in state law, cold weather rule protection specific to low-income is not tracked by the system. The Company recognizes as a matter of policy customers that entered into payment arrangements with the company as being protected under the cold weather rule.

3 Reasons for denial of emergency medical account status:
Customer did not return form.
Doctor refused to certify as Medical/Life Support.

Residential													
	Jan-13	Feb-13	Mar-13	Apr-13	May-13	Jun-13	Jul-13	Aug-13	Sep-13	Oct-13	Nov-13	Dec-13	Total 2013
# Service Installations	119	125	153	154	224	233	395	418	365	406	324	119	3035
Avg days to complete from customer and site ready	0	2	1	1	1	1	1	3	3	2	4	6	2
Commercial													
	Jan-13	Feb-13	Mar-13	Apr-13	May-13	Jun-13	Jul-13	Aug-13	Sep-13	Oct-13	Nov-13	Dec-13	Total 2013
# Service Installations	5	8	15	9	19	16	36	41	26	42	50	27	294
Avg days to complete from customer and site ready	7	19	6	13	4	14	19	7	7	17	14	6	11

	January	February	March	April	May	June	July	August	September	October	November	December	2013
1 All Residential Calls offered to Agents	95,813	90,558	90,585	111,276	128,837	175,527	145,716	143,989	126,119	122,944	102,506	105,798	1,439,668
2 All BSC Calls Offered to Agents	4,012	3,367	3,529	3,774	3,773	3,488	4,109	4,035	4,069	4,582	3,653	3,735	46,126
3 All Credit Calls Offered to Agents	21,024	19,940	24,809	40,728	33,567	27,971	32,191	36,893	38,344	32,430	22,265	15,788	345,950
4 All PAR Calls Offered to Agents	6,285	4,882	4,881	8,519	9,262	7,083	6,449	6,017	6,336	5,915	3,751	3,575	72,955
5 All Calls Offered to Agents	127,134	118,747	123,804	164,297	175,439	214,069	188,465	190,934	174,868	165,871	132,175	128,896	1,904,699
6 All Calls Excluding Credit and PAR	99,825	93,925	94,114	115,050	132,610	179,015	149,825	148,024	130,188	127,526	106,159	109,533	1,485,794
7 All Residential Calls Answered by Agents within 20 seconds	76,842	72,431	75,279	95,162	102,177	119,794	89,053	94,123	117,983	102,984	87,558	82,352	1,115,738
8 All BSC Calls Answered by Agents within 20 seconds	2,561	2,264	2,554	3,040	2,892	2,331	2,429	2,592	3,052	3,101	2,868	2,883	32,567
9 All Credit Calls Answered by Agents within 20 seconds	14,902	13,007	15,965	25,180	21,940	17,201	18,509	17,613	33,635	24,371	16,151	12,752	231,226
10 All PAR Calls Answered by Agents within 20 seconds	5,813	4,325	4,295	5,978	7,419	5,745	5,389	4,842	4,835	4,574	3,149	3,124	59,488
11 All Calls Answered by Agents within 20 seconds	100,118	92,027	98,093	129,360	134,428	145,071	115,380	119,170	159,505	135,030	109,726	101,111	1,439,019
12 All Calls Answered by Agents within 20 seconds Excluding Credit and PAR	79,403	74,695	77,833	98,202	105,069	122,125	91,482	96,715	121,035	106,085	90,426	85,235	1,148,305
13 Non-Billing and Outage Calls Completed in IVR	11,487	10,613	12,176	16,533	12,827	75,284	14,351	17,918	14,672	17,681	15,303	14,163	233,008
14 Billing Calls Handled by IVR	123,467	117,163	133,281	134,248	130,499	123,402	138,466	140,123	137,801	142,261	126,710	124,551	1,571,972
15 Outage Calls Handled by IVR	14,469	13,567	14,107	20,621	32,446	234,717	47,982	63,522	31,824	21,869	16,902	20,370	532,396
16 Outage Calls Offered to Agents	25,067	21,005	21,906	35,779	36,284	86,155	38,240	41,122	37,236	30,828	23,772	38,449	435,843
17 Total Outage Calls	39,536	34,572	36,013	56,400	68,730	320,872	86,222	104,644	69,060	52,697	40,674	58,819	968,239
18 All Calls Offered to Agents + Outage Calls Handled by IVR	141,603	132,314	137,911	184,918	207,885	448,786	236,447	254,456	206,692	187,740	149,077	149,266	2,437,095
19 All Calls Answered by Agents within 20 seconds + Outage Calls Handled by IVR	114,587	105,594	112,200	149,981	166,874	379,788	163,362	182,692	191,329	156,899	126,628	121,481	1,971,415
20 Res and BSC Calls Offered to Agents + Outage Calls Handled by IVR	114,294	107,492	108,221	135,671	165,056	413,732	197,807	211,546	162,012	149,395	123,061	129,903	2,018,190
21 Res and BSC Calls Answered by Agents within 20 seconds + Outage Calls Handled by IVR	93,872	88,262	91,940	118,823	137,515	356,842	139,464	160,237	152,859	127,954	107,328	105,605	1,680,701
22 All Calls Offered to Agents + Outage Calls Handled by IVR + Billing Calls Handled by IVR	265,070	249,477	271,192	319,166	338,384	572,188	374,913	394,579	344,493	330,001	275,787	273,817	4,009,067
23 All Calls Answered by Agents within 20 seconds + Outage Calls Handled by IVR + Billing Calls Handled by IVR	238,054	222,757	245,481	284,229	297,373	503,190	301,828	322,815	329,130	299,160	253,338	246,032	3,543,387

	January	February	March	April	May	June	July	August	September	October	November	December	2013	
24	Res and BSC Calls Offered to Agents + Outage Calls Handled by IVR + Billing Calls Handled by IVR	237,761	224,655	241,502	269,919	295,555	537,134	336,273	351,669	299,813	291,656	249,771	254,454	3,590,162
25	Res and BSC Calls Answered by Agents within 20 seconds + Outage Calls Handled by IVR + Billing Calls Handled by IVR	217,339	205,425	225,221	253,071	268,014	480,244	277,930	300,360	290,660	270,215	234,038	230,156	3,252,673
26	Service Level All Calls (including calls handled by IVR)	90.2%	89.7%	90.9%	89.6%	88.3%	89.3%	81.2%	82.6%	95.7%	91.1%	92.3%	90.4%	89.0%
27	Service Level All Calls (not including billing calls handled by IVR)	80.9%	79.8%	81.4%	81.1%	80.3%	84.6%	69.1%	71.8%	92.6%	83.6%	84.9%	81.4%	80.9%
28	Service Level Res and BSC Calls (including outage and billing calls handled by IVR)	91.4%	91.4%	93.3%	93.8%	90.7%	89.4%	82.7%	85.4%	96.9%	92.6%	93.7%	90.5%	90.6%
29	Service Level Res and BSC Calls (not including billing calls handled by IVR)	82.1%	82.1%	85.0%	87.6%	83.3%	86.2%	70.5%	75.7%	94.4%	85.6%	87.2%	81.3%	83.3%
30	Service Level (agent only)	78.7%	77.5%	79.2%	78.7%	76.6%	67.8%	61.2%	62.4%	91.2%	81.4%	83.0%	78.4%	75.6%
31	ASA (Agent only Residential, BSC, Credit and PAR)	17	20	18	30	19	52	41	42	7	13	14	18	26
	ASA Residential	15	17	14	13	16	56	39	37	6	10	12	19	23
	ASA BSC	41	36	30	18	24	35	48	44	20	34	22	21	31
	ASA Credit	25	34	33	76	32	36	53	68	8	19	24	13	37
	ASA PAR	7	10	10	34	19	17	14	17	24	22	12	12	17

Notes:

29	The service level formula is: (All Calls Answered by Agents within 20 seconds + Outage Calls Handled by IVR) / (All Calls Offered to Agents + Outage Calls Handled by IVR)
26	The service level formula is: (All Calls Answered by Agents within 20 seconds + Outage Calls Handled by IVR + Billing Calls Handled by IVR) / (All Calls Offered to Agents + Outage Calls Handled by IVR + Billing Calls Handled by IVR)
	Agent call volumes includes calls offered and handled at the Residential call centers (Amarillo, Centre Pointe and Sky Park), at the Business call center at Sky Park, at the Credit call centers at Amarillo and Centre
	Data on calls to agents is gathered from the phone switch (Avaya) based on skills.
	Data on IVR calls is gathered from the IVR reporting tool (Voice Portal).

**Minnesota Public Utilities Commission
Consumer Affairs Office
121-7th Place East
St. Paul, MN 55101-2147**

7826.2000 REPORTING CUSTOMER COMPLAINTS
For the period of January 01, 2013 to December 31, 2013

Name of Utility: Northern States Power Company
Address: 3115 Centre Pointe Drive, Roseville, MN 55113
Prepared by: Jeff Eden, Customer Advocate Analyst. Customer Care (303) 294-2214

A. The Number of Complaints Received

CustomerType	Source	Month												2013
		Jan-13	Feb-13	Mar-13	Apr-13	May-13	Jun-13	Jul-13	Aug-13	Sep-13	Oct-13	Nov-13	Dec-13	
Commercial	Commission	1	0	0	1	1	3	0	0	2	1	1	0	10
	Direct Customer Contact	0	1	0	0	0	1	0	0	0	0	0	0	2
	Informational	0	0	0	1	0	0	0	0	0	0	0	0	1
	Internal	1	4	3	1	1	3	1	0	3	0	1	0	18
	OAG	0	0	1	1	0	0	0	0	0	1	1	1	5
	Officer	0	0	1	0	0	0	2	0	1	0	1	0	5
Commercial Total		2	5	5	4	2	7	3	6	2	4	1	41	
Industrial	Internal	1	0	0	0	0	2	0	0	0	1	0	0	4
	Referral	0	0	0	0	0	0	0	1	0	0	0	0	1
Industrial Total		1	0	0	0	0	2	0	1	0	1	0	5	
Residential	BBB	1	2	0	2	3	2	5	6	2	3	3	1	30
	Commission	2	4	3	11	8	4	13	8	9	4	4	7	77
	Commission/BBB	0	0	1	0	1	0	0	0	0	0	0	0	2
	Commission/OAG	0	0	0	1	1	0	0	0	0	0	0	0	2
	Direct Customer Contact	0	1	0	3	0	0	1	0	1	0	0	0	6
	Informational	2	0	3	2	0	0	0	0	1	0	1	0	9
	Internal	10	15	13	33	19	22	24	24	28	20	13	11	232
	OAG	8	9	6	24	23	23	28	36	41	22	5	6	231
	Officer	0	1	3	2	2	5	5	1	3	7	3	0	32
	Referral	2	2	3	7	9	9	11	13	6	2	0	8	72
	Repeat Customer	0	0	0	0	0	0	0	0	0	1	0	1	2
	OAG/Officer	0	0	0	0	0	0	0	0	0	0	1	0	1
	Commission/Internal	0	0	0	0	0	1	1	0	0	0	0	0	2
Residential Total		25	34	32	85	66	66	88	88	91	59	30	698	
Government Total	Commission	0	0	0	1	0	0	0	0	0	0	0	0	1
Grand Total		28	39	37	90	68	75	91	89	97	62	34	35	745

**Minnesota Public Utilities Commission
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121-7th Place East
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7826.2000 REPORTING CUSTOMER COMPLAINTS
For the period of January 01, 2013 to December 31, 2013

Name of Utility: Northern States Power Company
Address: 3115 Centre Pointe Drive, Roseville, MN 55113
Prepared by: Jeff Eden, Customer Advocate Analyst, Customer Care (303) 294-2214

B. The Number and Percentage of Complaints Alleging:

CustomerType	MPUC	Month												2013
		Jan-13	Feb-13	Mar-13	Apr-13	May-13	Jun-13	Jul-13	Aug-13	Sep-13	Oct-13	Nov-13	Dec-13	
Commercial	Billing Error	0	0	0	2	0	0	0	0	2	1	0	1	6
	High Bill	0	1	0	0	0	2	0	0	0	1	0	4	
	Inadequate Service	0	4	4	2	2	4	2	0	3	1	1	23	
	Serv Rest Interval	1	0	0	0	0	1	1	0	0	0	1	4	
	Service Ext Interval	0	0	1	0	0	0	0	0	1	0	0	2	
	Wrongful Disconnect	1	0	0	0	0	0	0	0	0	0	1	2	
Commercial Total		2	5	5	4	2	7	3	0	6	2	4	41	
Industrial	High Bill	0	0	0	0	0	0	0	0	0	1	0	1	
	Inadequate Service	0	0	0	0	0	2	0	1	0	0	0	3	
	Inaccurate Metering	1	0	0	0	0	0	0	0	0	0	0	1	
Industrial Total		1	0	0	0	0	2	0	1	0	1	0	5	
Residential	Billing Error	5	7	10	8	7	9	9	12	11	7	5	7	97
	High Bill	0	4	3	3	1	4	7	2	1	1	1	0	27
	Inadequate Service	18	13	15	55	34	31	41	58	54	35	16	19	389
	Inaccurate Metering	0	0	0	1	1	0	2	2	1	1	1	1	10
	Serv Rest Interval	0	1	0	0	1	5	4	4	2	4	1	0	22
	Service Ext Interval	0	0	1	2	1	1	2	0	0	0	0	1	8
	Wrongful Disconnect	1	5	2	12	20	14	23	7	16	9	2	3	114
	Inaccurate	1	4	1	4	1	2	0	3	6	2	4	3	31
	Residential Total		25	34	32	85	66	66	88	88	91	59	30	34
Government	Inadequate Service	0	0	0	1	0	0	0	0	0	0	0	0	1
Government Total		0	0	0	1	0	0	0	0	0	0	0	0	1
Totals	Billing Error	5	7	10	10	7	9	9	12	13	8	5	8	103
	High Bill	0	5	3	3	1	6	7	2	1	2	2	0	32
	Inadequate Service	18	17	19	58	36	37	43	59	57	36	17	19	416
	Inaccurate Metering	1	0	0	1	1	0	2	2	1	1	1	1	11
	Serv Rest Interval	1	1	0	0	1	6	5	4	2	4	2	0	26
	Service Ext Interval	0	0	2	2	1	1	2	0	1	0	0	1	10
	Wrongful Disconnect	2	5	2	12	20	14	23	7	16	9	3	3	116
	Inaccurate	1	4	1	4	1	2	0	3	6	2	4	3	31
Grand Total		28	39	37	90	68	75	91	89	97	62	34	35	745

CustomerType	Complaint Type	Percentage												2013
		Jan-13	Feb-13	Mar-13	Apr-13	May-13	Jun-13	Jul-13	Aug-13	Sep-13	Oct-13	Nov-13	Dec-13	
Commercial	Billing Error	0.0%	0.0%	0.0%	50.0%	0.0%	0.0%	0.0%	0.0%	33.3%	50.0%	0.0%	100.0%	14.6%
	High Bill	0.0%	20.0%	0.0%	0.0%	0.0%	28.6%	0.0%	0.0%	0.0%	0.0%	25.0%	0.0%	9.8%
	Inadequate Service	0.0%	80.0%	80.0%	50.0%	100.0%	57.1%	66.7%	0.0%	50.0%	50.0%	25.0%	0.0%	56.1%
	Serv Rest Interval	50.0%	0.0%	0.0%	0.0%	0.0%	14.3%	33.3%	0.0%	0.0%	0.0%	25.0%	0.0%	9.8%
	Service Ext Interval	0.0%	0.0%	20.0%	0.0%	0.0%	0.0%	0.0%	0.0%	16.7%	0.0%	0.0%	0.0%	4.9%
	Wrongful Disconnect	50.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	25.0%	0.0%	4.9%
Industrial	High Bill	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	100.0%	0.0%	0.0%	20.0%
		0.0%	0.0%	0.0%	0.0%	0.0%	100.0%	0.0%	100.0%	0.0%	0.0%	0.0%	0.0%	60.0%
		100.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	20.0%
Residential	Billing Error	20.0%	20.6%	31.3%	9.4%	10.6%	13.6%	10.2%	13.6%	12.1%	11.9%	16.7%	20.6%	13.9%
	High Bill	0.0%	11.8%	9.4%	3.5%	1.5%	6.1%	8.0%	2.3%	1.1%	1.7%	3.3%	0.0%	3.9%
	Inadequate Service	72.0%	38.2%	46.9%	64.7%	51.5%	47.0%	46.6%	65.9%	59.3%	59.3%	53.3%	55.9%	55.7%
	Inaccurate Metering	0.0%	0.0%	0.0%	1.2%	1.5%	0.0%	2.3%	2.3%	1.1%	1.7%	3.3%	2.9%	1.4%
	Serv Rest Interval	0.0%	2.9%	0.0%	0.0%	1.5%	7.6%	4.5%	4.5%	2.2%	6.8%	3.3%	0.0%	3.2%
	Service Ext Interval	0.0%	0.0%	3.1%	2.4%	1.5%	1.5%	2.3%	0.0%	0.0%	0.0%	0.0%	2.9%	1.1%
	Wrongful Disconnect	4.0%	14.7%	6.3%	14.1%	30.3%	21.2%	26.1%	8.0%	17.6%	15.3%	6.7%	8.8%	16.3%
	Inaccurate	4.0%	11.8%	3.1%	4.7%	1.5%	3.0%	0.0%	3.4%	6.6%	3.4%	13.3%	8.8%	4.4%
	Total	Billing Error	17.9%	17.9%	27.0%	11.1%	10.3%	12.0%	9.9%	13.5%	13.4%	12.9%	14.7%	22.9%
	High Bill	0.0%	12.8%	8.1%	3.3%	1.5%	8.0%	7.7%	2.2%	1.0%	3.2%	5.9%	0.0%	4.3%
	Inadequate Service	64.3%	43.6%	51.4%	64.4%	52.9%	49.3%	47.3%	66.3%	58.8%	58.1%	50.0%	54.3%	55.8%
	Inaccurate Metering	3.6%	0.0%	0.0%	1.1%	1.5%	0.0%	2.2%	2.2%	1.0%	1.6%	2.9%	2.9%	1.5%
	Serv Rest Interval	3.6%	2.6%	0.0%	0.0%	1.5%	8.0%	5.5%	4.5%	2.1%	6.5%	5.9%	0.0%	3.5%
	Service Ext Interval	0.0%	0.0%	5.4%	2.2%	1.5%	1.3%	2.2%	0.0%	1.0%	0.0%	0.0%	2.9%	1.3%
	Wrongful Disconnect	7.1%	12.8%	5.4%	13.3%	29.4%	18.7%	25.3%	7.9%	16.5%	14.5%	8.8%	8.6%	15.6%
	Inaccurate	3.6%	10.3%	2.7%	4.4%	1.5%	2.7%	0.0%	3.4%	6.2%	3.2%	11.8%	8.6%	4.2%

**Minnesota Public Utilities Commission
Consumer Affairs Office
121-7th Place East
St. Paul, MN 55101-2147**

7826.2000 REPORTING CUSTOMER COMPLAINTS
For the period of January 01, 2013 to December 31, 2013

Name of Utility: Northern States Power Company
Address: 3115 Centre Pointe Drive, Roseville, MN 55113
Prepared by: Jeff Eden, Customer Advocate Analyst. Customer Care (303) 294-2214

C. The Number and Percentage of Complaints Resolved upon:

Customer Type	DTR Status	Month												2013	
		Jan-13	Feb-13	Mar-13	Apr-13	May-13	Jun-13	Jul-13	Aug-13	Sep-13	Oct-13	Nov-13	Dec-13		
Commercial	Immediate	0	1	1	0	0	2	0	0	0	0	0	0	0	4
	10 Days or Less	1	4	4	4	1	5	2	0	5	2	4	1	1	33
	Greater Than 10 Days	1	0	0	0	1	0	1	0	1	0	0	0	0	4
Commercial Total		2	5	5	4	2	7	3	0	6	2	4	1	41	
Industrial	Immediate	1	0	0	0	0	0	0	0	0	0	0	0	0	1
	10 Days or Less	0	0	0	0	0	2	0	1	0	1	0	0	0	4
	Greater Than 10 Days	1	0	0	0	0	2	0	1	0	1	0	0	0	5
Industrial Total		1	0	0	0	0	2	0	1	0	1	0	0	5	
Residential	Immediate	8	9	5	18	13	13	16	23	15	7	4	6	6	137
	10 Days or Less	14	23	24	65	50	48	69	64	73	51	26	28	28	535
	Greater Than 10 Days	3	2	3	2	3	5	3	1	3	1	0	0	0	26
Residential Total		25	34	32	85	66	66	88	88	91	59	30	34	698	
Government	10 Days or Less	0	0	0	1	0	0	0	0	0	0	0	0	0	1
	Greater Than 10 Days	0	0	0	1	0	0	0	0	0	0	0	0	0	1
	Government Total	0	0	0	1	0	0	0	0	0	0	0	0	0	1
Grand Total	Immediate	8	10	6	18	13	15	16	23	15	7	4	6	6	141
	10 Days or Less	16	27	28	70	51	53	71	64	78	53	30	29	29	570
	Greater Than 10 Days	4	2	3	2	4	7	4	2	4	2	0	0	0	34
Grand Total		28	39	37	90	68	75	91	89	97	62	34	35	745	

Commercial	Immediate	0.0%	20.0%	20.0%	0.0%	0.0%	28.6%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	9.8%
	10 Days or Less	50.0%	80.0%	80.0%	100.0%	50.0%	71.4%	66.7%	0.0%	83.3%	100.0%	100.0%	100.0%	100.0%	80.5%
	Greater Than 10 Days	50.0%	0.0%	0.0%	0.0%	50.0%	0.0%	33.3%	0.0%	16.7%	0.0%	0.0%	0.0%	0.0%	9.8%
Industrial	10 Days or Less	100.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	20.0%
	Greater Than 10 Days	0.0%	0.0%	0.0%	0.0%	0.0%	100.0%	0.0%	100.0%	0.0%	100.0%	0.0%	0.0%	0.0%	80.0%
	Industrial Total	100.0%	0.0%	0.0%	0.0%	0.0%	100.0%	0.0%	100.0%	0.0%	100.0%	0.0%	0.0%	0.0%	100.0%
Residential	Immediate	32.0%	26.5%	15.6%	21.2%	19.7%	19.7%	18.2%	26.1%	16.5%	11.9%	13.3%	17.6%	19.6%	
	10 Days or Less	56.0%	67.6%	75.0%	76.5%	75.8%	72.7%	78.4%	72.7%	80.2%	86.4%	86.7%	82.4%	76.6%	
	Greater Than 10 Days	12.0%	5.9%	9.4%	2.4%	4.5%	7.6%	3.4%	1.1%	3.3%	1.7%	0.0%	0.0%	3.7%	
Residential Total		32.0%	26.5%	15.6%	21.2%	19.7%	19.7%	18.2%	26.1%	16.5%	11.9%	13.3%	17.6%	19.6%	
Government	10 Days or Less	0.00%	0.00%	0.00%	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	100.00%
	Greater Than 10 Days	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	Government Total	0.00%	0.00%	0.00%	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	100.00%
Grand Total	Immediate	28.6%	25.6%	16.2%	20.0%	19.1%	20.0%	17.6%	25.8%	15.5%	11.3%	11.8%	17.1%	18.9%	
	10 Days or Less	57.1%	69.2%	75.7%	77.8%	75.0%	70.7%	78.0%	71.9%	80.4%	85.5%	88.2%	82.9%	76.5%	
	Greater Than 10 Days	14.3%	5.1%	8.1%	2.2%	5.9%	9.3%	4.4%	2.2%	4.1%	3.2%	0.0%	0.0%	4.6%	

D. The Number and Percentage of Complaints Resolved by taking the following actions:

Customer Type	MN Action	Month												2013	
		Jan-13	Feb-13	Mar-13	Apr-13	May-13	Jun-13	Jul-13	Aug-13	Sep-13	Oct-13	Nov-13	Dec-13		
Commercial	Action not in Control of Utility	0	0	0	0	0	1	0	0	1	0	0	0	0	2
	Refuse Action Cust Requested	0	0	1	0	1	2	1	0	1	1	2	0	0	9
	Take Action Cust and Utility Agree Upon	1	1	0	2	0	3	2	0	2	1	2	1	1	15
	Take Action Cust Request	1	4	4	2	1	1	0	0	2	0	0	0	0	15
Commercial Total		2	5	5	4	2	7	3	0	6	2	4	1	41	
Industrial	Take Action Cust and Utility Agree Upon	1	0	0	0	0	0	0	0	0	0	0	0	0	1
	Take Action Cust Request	0	0	0	0	0	2	0	1	0	1	0	0	0	4
	Industrial Total	1	0	0	0	0	2	0	1	0	1	0	0	0	5
Residential	Action not in Control of Utility	0	1	1	4	2	5	0	2	3	3	4	1	1	26
	Refuse Action Cust Requested	1	6	5	6	10	10	9	5	7	6	2	5	7	72
	Take Action Cust and Utility Agree Upon	16	18	12	39	35	28	47	43	43	29	9	15	15	334
	Take Action Cust Request	8	9	14	36	19	23	32	38	38	21	15	13	13	266
Residential Total		25	34	32	85	66	66	88	88	91	59	30	34	698	
Government	Take Action Cust and Utility Agree Upon	0	0	0	1	0	0	0	0	0	0	0	0	0	1
	Take Action Cust Request	0	0	0	1	0	0	0	0	0	0	0	0	0	1
	Government Total	0	0	0	1	0	0	0	0	0	0	0	0	0	1
Grand Total	Action not in Control of Utility	0	1	1	4	2	6	0	2	4	3	4	1	1	28
	Refuse Action Cust Requested	1	6	6	6	11	12	10	5	8	7	4	5	8	81
	Take Action Cust and Utility Agree Upon	18	19	12	42	35	31	49	43	45	30	11	16	16	351
	Take Action Cust Request	9	13	18	38	20	26	32	39	40	22	15	13	13	285
Grand Total		28	39	37	90	68	75	91	89	97	62	34	35	745	

Customer Type	MN Action	Month												2013	
		Jan-13	Feb-13	Mar-13	Apr-13	May-13	Jun-13	Jul-13	Aug-13	Sep-13	Oct-13	Nov-13	Dec-13		
Commercial	Action Not In Control Of Utility	0.0%	0.0%	0.0%	0.0%	0.0%	14.3%	0.0%	0.0%	16.7%	0.0%	0.0%	0.0%	0.0%	4.9%
	Refuse Action Cust Requested	0.0%	0.0%	20.0%	0.0%	50.0%	28.6%	33.3%	0.0%	16.7%	50.0%	50.0%	0.0%	22.0%	
	Take Action Cust and Utility Agree Upon	50.0%	20.0%	0.0%	50.0%	0.0%	42.9%	66.7%	0.0%	33.3%	50.0%	50.0%	100.0%	36.6%	
	Take Action Cust Request	50.0%	80.0%	80.0%	50.0%	50.0%	14.3%	0.0%	0.0%	33.3%	0.0%	0.0%	0.0%	36.6%	
Industrial	Refuse Action Cust Requested	100.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	20.0%	
	Take Action Cust Request	0.0%	0.0%	0.0%	0.0%	0.0%	100.0%	0.0%	100.0%	0.0%	100.0%	0.0%	0.0%	80.0%	
	Industrial Total	100.0%	0.0%	0.0%	0.0%	0.0%	100.0%	0.0%	100.0%	0.0%	100.0%	0.0%	0.0%	100.0%	
Residential	Action Not In Control Of Utility	0.0%	2.9%	3.1%	4.7%	3.0%	7.6%	0.0%	2.3%	3.3%	5.1%	13.3%	2.9%	3.7%	
	Refuse Action Cust Requested	4.0%	17.6%	15.6%	7.1%	15.2%	15.2%	10.2%	5.7%	7.7%	10.2%	6.7%	14.7%	10.3%	
	Take Action Cust and Utility Agree Upon	64.0%	52.9%	37.5%	45.9%	53.0%	42.4%	53.4%	48.9%	47.3%	49.2%	30.0%	44.1%	47.9%	
	Take Action Cust Request	32.0%	26.5%	43.8%	42.4%	28.8%	34.8%	36.4%	43.2%	41.8%	35.6%	50.0%	38.2%	38.1%	
Government	Take Action Cust Request	0.0%	0.0%	0.0%	100.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	100.0%	
	Government Total	0.0%	0.0%	0.0%	100.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	100.0%	
	Total	0.0%	2.6%	2.7%	4.4%	2.9%	8.0%	0.0%	2.2%	4.1%	4.8%	11.8%	2.9%	3.76%	
Total	Refuse Action Cust Requested	3.6%	15.4%	16.2%	6.7%	16.2%	16.0%	11.0%	5.6%	8.2%	11.3%	11.8%	14.3%	10.87%	
	Take Action Cust and Utility Agree Upon	64.3%	48.7%	32.4%	46.7%	51.5%	41.3%	53.8%	48.3%	46.4%	48.4%	32.4%	45.7%	47.11%	
	Take Action Cust Request	32.1%	33.3%	48.6%	42.2%	29.4%	34.7%	35.2%	43.8%	41.2%	35.5%	44.1%	37.1%	38.26%	
	Total	0.0%	2.6%	2.7%	4.4%	2.9%	8.0%	0.0%	2.2%	4.1%	4.8%	11.8%	2.9%	3.76%	

**Minnesota Public Utilities Commission
Consumer Affairs Office
121-7th Place East
St. Paul, MN 55101-2147**

7826.2000 REPORTING CUSTOMER COMPLAINTS

For the period of January 01, 2013 to December 31, 2013

Name of Utility: Northern States Power Company
Address: 3115 Centre Pointe Drive, Roseville, MN 55113
Prepared by: Jeff Eden, Customer Advocate Analyst. Customer Care (303) 294-2214

E. The Number of Complaints forwarded to the Utility by the Commission's Consumer Affairs Office for Further Investigation and Action

CustomerType	Source	Month												2013
		Jan-13	Feb-13	Mar-13	Apr-13	May-13	Jun-13	Jul-13	Aug-13	Sep-13	Oct-13	Nov-13	Dec-13	
Commercial	Commission	1	0	0	1	1	3	0	0	2	1	1	0	10
Commercial Total		1	0	0	1	1	3	0	0	2	1	1	0	10
Residential	Commission	2	4	3	11	8	4	13	8	9	4	4	7	77
	Commission/BBB	0	0	1	0	1	0	0	0	0	0	0	0	2
	Commission/OAG	0	0	0	1	1	0	0	0	0	0	0	0	2
Residential Total	Commission/Internal	0	0	0	0	0	1	1	0	0	0	0	0	2
		2	4	4	12	10	5	14	8	9	4	4	7	83
Government	Commission	0	0	0	1	0	0	0	0	0	0	0	0	1
Government Total		0	0	0	1	0	0	0	0	0	0	0	0	1
Grand Total		3	4	4	14	11	8	14	8	11	5	5	7	94

**Xcel Energy
Customer Complaint Report
January, 2013**

**Turnaround Days for
Closing a Complaint**

	Agree	Compromise	Demonstrate	Refuse	Total	%	Initial Inquiry	within 10 days	Longer than 10 days
Commercial									
Billing errors	2671	18	21	4	2,714	74.66%	2,702	11	1
Inaccurate Metering	20	0	0	0	20	0.55%	17	3	0
Wrongful Disconnect	264	6	9	1	280	7.70%	278	2	0
High Bill	97	0	0	0	97	2.67%	96	1	0
Inadequate Service	282	7	9	0	298	8.20%	296	1	1
Service Extension	1	0	0	0	1	0.03%	1	0	0
Service Restoration	217	4	4	0	225	6.19%	225	0	0
Total Commercial	3,552	35	43	5	3,635		3,615	18	2
Total Commercial Percentage	97.72%	0.96%	1.18%	0.14%					
Industrial									
Billing errors	350	5	2	0	357	77.27%	356	1	0
Inaccurate Metering	4	0	0	0	4	0.87%	4	0	0
Wrongful Disconnect	14	0	0	0	14	3.03%	14	0	0
High Bill	2	0	0	0	2	0.43%	2	0	0
Inadequate Service	33	3	0	0	36	7.79%	35	1	0
Service Extension	0	0	0	0	0	0.00%	0	0	0
Service Restoration	48	0	1	0	49	10.61%	49	0	0
Total Industrial	451	8	3	0	462		460	2	0
Total Industrial Percentage	97.62%	1.73%	0.65%	0.00%					
Residential									
Billing errors	31253	406	369	19	32,047	58.29%	32000	33	1
Inaccurate Metering	46	1	2	0	49	0.09%	48	1	0
Wrongful Disconnect	9949	125	184	8	10,266	18.67%	10254	11	0
High Bill	1473	39	52	0	1,564	2.84%	1561	3	0
Inadequate Service	9293	202	285	2	9,782	17.79%	9773	9	0
Service Extension	13	1	0	0	14	0.03%	14	0	0
Service Restoration	1195	28	29	1	1,253	2.28%	1251	2	0
Total Residential	53,222	802	921	30	54,975		54,901	59	1
Total Residential Percentage	96.81%	1.46%	1.68%	0.05%					
Total State of Minnesota	57,225	845	967	35	59,072		58,976	79	3
Total ST of MN Percentage	96.87%	1.43%	1.64%	0.06%					

**Xcel Energy
Customer Complaint Report
February, 2013**

**Turnaround Days for
Closing a Complaint**

	Agree	Compromise	Demonstrate	Refuse	Total	%	Initial Inquiry	within 10 days	Longer than 10 days
Commercial									
Billing errors	2,168	16	11	0	2,195	75.77%	2,184	11	0
Inaccurate Metering	12	0	0	0	12	0.41%	12	0	0
Wrongful Disconnect	213	3	7	0	223	7.70%	220	3	0
High Bill	88	1	1	0	90	3.11%	89	1	0
Inadequate Service	189	2	3	0	194	6.70%	190	4	0
Service Extension	0	0	0	0	0	0.00%	0	0	0
Service Restoration	175	2	6	0	183	6.32%	183	0	0
Total Commercial	2,845	24	28	0	2,897		2,878	19	0
Total Commercial Percent	98.21%	0.83%	0.97%	0.00%					
Industrial									
Billing errors	272	2	0	0	274	74.05%	273	1	0
Inaccurate Metering	1	0	0	0	1	0.27%	1	0	0
Wrongful Disconnect	6	0	0	0	6	1.62%	5	1	0
High Bill	1	0	0	0	1	0.27%	1	0	0
Inadequate Service	34	0	0	0	34	9.19%	33	1	0
Service Extension	0	0	0	0	0	0.00%	0	0	0
Service Restoration	52	1	1	0	54	14.59%	54	0	0
Total Industrial	366	3	1	0	370		367	3	0
Total Industrial Percentage	98.92%	0.81%	0.27%	0.00%					
Residential									
Billing errors	27,949	386	300	16	28,651	59.03%	28,606	33	0
Inaccurate Metering	37	1	1	0	39	0.08%	39	0	0
Wrongful Disconnect	8,736	93	183	11	9,023	18.59%	9,017	6	0
High Bill	1,179	35	46	2	1,262	2.60%	1,261	1	0
Inadequate Service	8,066	179	196	3	8,444	17.40%	8,438	6	0
Service Extension	9	0	2	0	11	0.02%	11	0	0
Service Restoration	1,053	21	31	1	1,106	2.28%	1,104	2	0
Total Residential	47,029	715	759	33	48,536		48,476	48	0
Total Residential Percentage	96.90%	1.47%	1.56%	0.07%					
Total State of Minnesota	50,240	742	788	33	51,803		51,721	70	0
Total ST of MN Percentage	96.98%	1.43%	1.52%	0.06%					

**Xcel Energy
Customer Complaint Report
March, 2013**

**Turnaround Days for
Closing a Complaint**

	Agree	Compromise	Demonstrate	Refuse	Total	%	Initial Inquiry	within 10 days	Longer than 10 days	
Commercial										
Billing errors	2,311	15	17	1	2,344	77.11%	2334	9	1	
Inaccurate Metering	11	0	0	0	11	0.36%	11	0	0	
Wrongful Disconnect	214	1	1	1	217	7.14%	216	1	0	
High Bill	50	3	1	0	54	1.78%	54	0	0	
Inadequate Service	241	3	3	0	247	8.13%	244	3	0	
Service Extension	0	0	0	0	0	0.00%	0	0	0	
Service Restoration	163	1	3	0	167	5.49%	167	0	0	
Total Commercial	2,990	23	25	2	3,040		3,026	13	1	
Total Commercial Percent	98.36%	0.76%	0.82%	0.07%						
Industrial										
Billing errors	240	3	0	0	243	75.70%	241	2	0	
Inaccurate Metering	0	0	0	0	0	0.00%	0	0	0	
Wrongful Disconnect	8	0	0	0	8	2.49%	8	0	0	
High Bill	5	0	1	0	6	1.87%	6	0	0	
Inadequate Service	28	0	0	0	28	8.72%	28	0	0	
Service Extension	0	0	0	0	0	0.00%	0	0	0	
Service Restoration	35	0	1	0	36	11.21%	36	0	0	
Total Industrial	316	3	2	0	321		319	2	0	
Total Industrial Percentage	98.44%	0.93%	0.62%	0.00%						
Residential										
Billing errors	30,001	378	407	14	30,800	58.59%	30,764	33	2	
Inaccurate Metering	26	0	2	0	28	0.05%	28	0	0	
Wrongful Disconnect	10,709	117	182	16	11,024	20.97%	11019	4	1	
High Bill	788	14	42	1	845	1.61%	843	1	1	
Inadequate Service	8,434	189	226	6	8,855	16.84%	8843	12	0	
Service Extension	8	1	0	0	9	0.02%	9	0	0	
Service Restoration	964	20	23	1	1,008	1.92%	1,008	0	0	
Total Residential	50,930	719	882	38	52,569		52,514	50	4	
Total Residential Percentage	96.88%	1.37%	1.68%	0.07%						
Total State of Minnesota	54,236	745	909	40	55,930		55,859	65	5	
Total ST of MN Percentage	96.97%	1.33%	1.63%	0.07%						

**Xcel Energy
Customer Complaint Report
April, 2013**

**Turnaround Days for
Closing a Complaint**

	Agree	Compromise	Demonstrate	Refuse	Total	%	Initial Inquiry	within 10 days	Longer than 10 days	
Commercial										
Billing errors	2,284	19	27	0	2,330	73.09%	2325	4	1	
Inaccurate Metering	15	1	0	0	16	0.50%	15	1	0	
Wrongful Disconnect	281	4	3	0	288	9.03%	286	2	0	
High Bill	36	1	1	0	38	1.19%	38	0	0	
Inadequate Service	277	4	3	0	284	8.91%	283	1	0	
Service Extension	1	0	0	0	1	0.03%	1	0	0	
Service Restoration	223	2	6	0	231	7.25%	230	1	0	
Total Commercial	3,117	31	40	0	3,188	100%	3,178	9	1	
Total Commercial Percent	97.77%	0.97%	1.25%	0.00%						
Industrial										
					305					
Billing errors	299	3	3	0	4	74.03%	305	0	0	
Inaccurate Metering	4	0	0	0	8	0.97%	4	0	0	
Wrongful Disconnect	8	0	0	0	2	1.94%	8	0	0	
High Bill	2	0	0	0	35	0.49%	2	0	0	
Inadequate Service	35	0	0	0	1	8.50%	34	1	0	
Service Extension	1	0	0	0	57	0.24%	1	0	0	
Service Restoration	56	0	1	0		13.83%	56	1	0	
Total Industrial	405	3	4	0	412		410	2	0	
Total Industrial Percentage	98.30%	0.73%	0.97%	0.00%						
Residential										
					33,103					
Billing errors	32,244	452	384	23	35	48.88%	33,071	30	1	
Inaccurate Metering	31	2	2	0	18,914	0.05%	34	1	0	
Wrongful Disconnect	18,156	344	395	19	679	27.93%	18906	7	0	
High Bill	630	16	29	4	13,112	1.00%	677	2	0	
Inadequate Service	12,383	391	324	14	23	19.36%	13104	6	2	
Service Extension	17	1	5	0	1,859	0.03%	23	0	0	
Service Restoration	1,791	25	42	1		2.74%	1,858	0	0	
Total Residential	65,252	1,231	1,181	61	67,725		67,673	46	3	
Total Residential Percentage	96.35%	1.82%	1.74%	0.09%						
Total State of Minnesota	68,774	1,265	1,225	61	71,325		71,261	57	4	
Total ST of MN Percentage	96.42%	1.77%	1.72%	0.09%						

**Xcel Energy
Customer Complaint Report
May, 2013**

**Turnaround Days for
Closing a Complaint**

	Agree	Compromise	Demonstrate	Refuse	Total	%	Initial Inquiry	within 10 days	Longer than 10 days	
Commercial										
Billing errors	2,150	10	33	0	2,193	72.14%	2182	11	0	
Inaccurate Metering	14	0	0	0	14	0.46%	14	0	0	
Wrongful Disconnect	220	1	5	1	227	7.47%	224	3	0	
High Bill	37	1	1	0	39	1.28%	39	0	0	
Inadequate Service	258	5	2	0	265	8.72%	264	1	0	
Service Extension	2	0	0	0	2	0.07%	2	0	0	
Service Restoration	289	4	7	0	300	9.87%	299	1	0	
Total Commercial	2,970	21	48	1	3,040		3,024	16	0	
Total Commercial Percent	97.70%	0.69%	1.58%	0.03%						
Industrial										
Billing errors	264	2	3	0	269	71.16%	264	5	0	
Inaccurate Metering	4	0	0	0	4	1.06%	4	0	0	
Wrongful Disconnect	2	0	0	0	2	0.53%	2	0	0	
High Bill	0	0	0	0	0	0.00%	0	0	0	
Inadequate Service	29	0	0	0	29	7.67%	28	1	0	
Service Extension	0	0	0	0	0	0.00%	0	0	0	
Service Restoration	73	1	0	0	74	19.58%	74	0	0	
Total Industrial	372	3	3	0	378		372	6	0	
Total Industrial Percentage	98.41%	0.79%	0.79%	0.00%						
Residential										
Billing errors	32,148	455	429	22	33,054	49.46%	33,007	42	1	
Inaccurate Metering	39	4	2	0	45	0.07%	45	0	0	
Wrongful Disconnect	17,168	388	444	26	18,026	26.97%	18014	10	1	
High Bill	525	14	22	0	561	0.84%	561	0	0	
Inadequate Service	12,136	327	321	14	12,798	19.15%	12786	11	1	
Service Extension	25	0	3	0	28	0.04%	28	0	0	
Service Restoration	2,217	34	64	1	2,316	3.47%	2,316	0	0	
Total Residential	64,258	1,222	1,285	63	66,828		66,757	63	3	
Total Residential Percentage	96.15%	1.83%	1.92%	0.09%						
Total State of Minnesota	67,600	1,246	1,336	64	70,246		70,153	85	3	
Total ST of MN Percentage	96.23%	1.77%	1.90%	0.09%						

**Xcel Energy
Customer Complaint Report
June, 2013**

**Turnaround Days for
Closing a Complaint**

	Agree	Compromise	Demonstrate	Refuse	Total	%	Initial Inquiry	within 10 days	Longer than 10 days
Commercial									
Billing errors	2,000	18	18	0	2,036	55.90%	2032	4	0
Inaccurate Metering	9	0	0	0	9	0.25%	9	0	0
Wrongful Disconnect	181	2	3		186	5.11%	186	0	0
High Bill	59	2	0	0	61	1.67%	61	0	0
Inadequate Service	220	3	6	0	229	6.29%	229	0	0
Service Extension	4	1	0	0	5	0.14%	5	0	0
Service Restoration	1,057	18	40	1	1116	30.64%	1115	0	1
Total Commercial	3,530	44	67	1	3,642		3,637	4	1
Total Commercial Percent	96.92%	1.21%	1.84%	0.03%					
Industrial									
Billing errors	218	0	0	0	218	38.65%	217	1	0
Inaccurate Metering	2	0	0	0	2	0.35%	2	0	0
Wrongful Disconnect	11	0	0	0	11	1.95%	10	1	0
High Bill	2	1	0	0	3	0.53%	3	0	0
Inadequate Service	26	0	0	0	26	4.61%	26	0	0
Service Extension	0	0	0	0	0	0.00%	0	0	0
Service Restoration	287	6	11	0	304	53.90%	304	0	0
Total Industrial	546	7	11	0	564		562	2	0
Total Industrial Percentage	96.81%	1.24%	1.95%	0.00%					
Residential									
Billing errors	31,372	420	405	17	32,214	43.23%	32,186	26	0
Inaccurate Metering	70	6	3	0	79	0.11%	78	1	0
Wrongful Disconnect	14,355	212	326	22	14,915	20.02%	14904	10	0
High Bill	635	13	35	1	684	0.92%	683	1	0
Inadequate Service	10,174	259	319	11	10,763	14.45%	10752	11	0
Service Extension	37	3	3	0	43	0.06%	43	0	0
Service Restoration	14,880	239	684	9	15,812	21.22%	15,805	7	0
Total Residential	71,523	1,152	1,775	60	74,510		74,451	56	0
Total Residential Percentage	95.99%	1.55%	2.38%	0.08%					
Total State of Minnesota	75,599	1,203	1,853	61	78,716		78,650	62	1
Total ST of MN Percentage	96.04%	1.53%	2.35%	0.08%					

**Xcel Energy
Customer Complaint Report
July, 2013**

**Turnaround Days for
Closing a Complaint**

	Agree	Compromise	Demonstrate	Refuse	Total	%	Initial Inquiry	within 10 days	Longer than 10 days
Commercial									
Billing errors	2,236	26	4	5	2,271	68.44%	2263	6	1
Inaccurate Metering	22	0	0	0	22	0.66%	21	1	0
Wrongful Disconnect	203	5	9	1	218	6.57%	217	1	0
High Bill	82	0	5	0	87	2.62%	87	0	0
Inadequate Service	230	2	3	0	235	7.08%	233	2	0
Service Extension	2	0	2	0	4	0.12%	4	0	0
Service Restoration	468	7	6	0	481	14.50%	481	0	0
Total Commercial	3,243	40	29	6	3,318		3,306	10	1
Total Commercial Percent	97.74%	1.21%	0.87%	0.18%					
Industrial									
Billing errors	289	3	3	0	295	62.50%	293	2	0
Inaccurate Metering	3	0	0	0	3	0.64%	3	0	0
Wrongful Disconnect	6	0	0	0	6	1.27%	5	1	0
High Bill	11	0	0	0	11	2.33%	11	0	0
Inadequate Service	25	0	1	0	26	5.51%	26	0	0
Service Extension	0	0	0	0	0	0.00%	0	0	0
Service Restoration	127	1	3	0	131	27.75%	131	0	0
Total Industrial	461	4	7	0	472		469	3	0
Total Industrial Percentage	97.67%	0.85%	1.48%	0.00%					
Residential									
Billing errors	36,860	497	473	21	37,851	52.94%	37,810	40	1
Inaccurate Metering	158	9	2	0	169	0.24%	169	0	0
Wrongful Disconnect	15,143	185	372	24	15,724	21.99%	15706	12	1
High Bill	1,760	53	54	1	1,868	2.61%	1868	0	0
Inadequate Service	11,302	275	303	7	11,887	16.63%	11878	9	0
Service Extension	29	2	11	0	42	0.06%	42	0	0
Service Restoration	3,766	64	119	2	3,951	5.53%	3,948	2	0
Total Residential	69,018	1,085	1,334	55	71,492		71,421	63	2
Total Residential Percentage	96.54%	1.52%	1.87%	0.08%					
Total State of Minnesota	72,722	1,129	1,370	61	75,282		75,196	76	3
Total ST of MN Percentage	96.60%	1.50%	1.82%	0.08%					

**Xcel Energy
Customer Complaint Report
August, 2013**

**Turnaround Days for
Closing a Complaint**

	Agree	Compromise	Demonstrate	Refuse	Total	%	Initial Inquiry	within 10 days	Longer than 10 days
Commercial									
Billing errors	2,198	29	18	3	2,248	66.45%	2240	8	0
Inaccurate Metering	9	0	0	0	9	0.27%	8	1	0
Wrongful Disconnect	210	1	6	0	217	6.41%	215	2	0
High Bill	99	1	0	0	100	2.96%	100	0	0
Inadequate Service	286	5	6	0	297	8.78%	295	2	0
Service Extension	1	2	0	0	3	0.09%	3	0	0
Service Restoration	488	6	15	0	509	15.05%	508	1	0
Total Commercial	3,291	44	45	3	3,383		3,369	14	0
Total Commercial Percent	97.28%	1.30%	1.33%	0.09%					
Industrial									
Billing errors	265	1	1	0	267	53.40%	267	0	0
Inaccurate Metering	0	0	0	0	0	0.00%	0	0	0
Wrongful Disconnect	14	0	0	0	14	2.80%	14	0	0
High Bill	10	0	0	0	10	2.00%	9	1	0
Inadequate Service	30	0	1	0	31	6.20%	30	1	0
Service Extension	1	0	0	0	1	0.20%	1	0	0
Service Restoration	166	2	9	0	177	35.40%	177	0	0
Total Industrial	486	3	11	0	500		498	2	0
Total Industrial Percentage	97.20%	0.60%	2.20%	0.00%					
Residential									
Billing errors	34,305	700	408	19	35,432	49.38%	35,405	24	1
Inaccurate Metering	90	3	1	0	94	0.13%	94	0	0
Wrongful Disconnect	15,620	451	508	42	16,621	23.16%	16608	11	0
High Bill	1,835	66	72	2	1,975	2.75%	1974	1	0
Inadequate Service	11,796	412	293	10	12,511	17.44%	12503	6	2
Service Extension	41	6	6	0	53	0.07%	53	0	0
Service Restoration	4,745	91	230	2	5,068	7.06%	5,066	2	0
Total Residential	68,432	1,729	1,518	75	71,754		71,703	44	3
Total Residential Percentage	95.37%	2.41%	2.12%	0.10%					
Total State of Minnesota	72,209	1,776	1,574	78	75,637		75,570	60	3
Total ST of MN Percentage	95.47%	2.35%	2.08%	0.10%					

**Xcel Energy
Customer Complaint Report
September, 2013**

**Turnaround Days for
Closing a Complaint**

	Agree	Compromise	Demonstrate	Refuse	Total	%	Initial Inquiry	within 10 days	Longer than 10 days
Commercial									
Billing errors	2,711	33	15	0	2,759	76.49%	2752	6	1
Inaccurate Metering	10	0	1	0	11	0.30%	10	1	0
Wrongful Disconnect	161	2	3	1	167	4.63%	165	2	0
High Bill	58	2	1	0	61	1.69%	61	0	0
Inadequate Service	220	7	4	0	231	6.40%	230	1	0
Service Extension	0	0	1	0	1	0.03%	1	0	0
Service Restoration	364	6	7	0	377	10.45%	375	1	0
Total Commercial	3,524	50	32	1	3,607		3,594	11	1
Total Commercial Percent	97.70%	1.39%	0.89%	0.03%					
Industrial									
Billing errors	268	1	0	0	269	66.09%	268	1	0
Inaccurate Metering	0	0	0	0	0	0.00%	0	0	0
Wrongful Disconnect	5	0	0	0	5	1.23%	5	0	0
High Bill	4	0	0	0	4	0.98%	4	0	0
Inadequate Service	19	3	0	0	22	5.41%	22	0	0
Service Extension	0	0	0	0	0	0.00%	0	0	0
Service Restoration	102	1	4	0	107	26.29%	107	0	0
Total Industrial	398	5	4	0	407		406	1	0
Total Industrial Percentage	97.79%	1.23%	0.98%	0.00%					
Residential									
Billing errors	35,994	610	506	24	37,134	53.74%	37,084	50	0
Inaccurate Metering	69	0	1	0	70	0.10%	70	0	0
Wrongful Disconnect	15,140	399	593	38	16,170	23.40%	16156	13	0
High Bill	1,144	43	57	2	1,246	1.80%	1245	1	0
Inadequate Service	11,365	357	309	10	12,041	17.43%	12033	7	1
Service Extension	24	3	11	0	38	0.05%	37	1	0
Service Restoration	2,297	38	67	0	2,402	3.48%	2,395	7	0
Total Residential	66,033	1,450	1,544	74	69,101		69,020	79	1
Total Residential Percentage	95.56%	2.10%	2.23%	0.11%					
Total State of Minnesota	69,955	1,505	1,580	75	73,115		73,020	91	2
Total ST of MN Percentage	95.68%	2.06%	2.16%	0.10%					

**Xcel Energy
Customer Complaint Report
October, 2013**

**Turnaround Days for
Closing a Complaint**

	Agree	Compromise	Demonstrate	Refuse	Total	%	Initial Inquiry	within 10 days	Longer than 10 days
Commercial									
Billing errors	2,758	29	12	0	2799	76.33%	2,792	7	0
Inaccurate Metering	9	0	0	0	9	0.25%	9	0	0
Wrongful Disconnect	239	7	4	0	250	6.82%	250	0	0
High Bill	59	2	0	0	61	1.66%	61	0	0
Inadequate Service	295	5	2	0	302	8.24%	299	3	0
Service Extension	3	0	0	0	3	0.08%	3	0	0
Service Restoration	236	2	5	0	243	6.63%	243	0	0
Total Commercial	3,599	45	23	0	3,667		3,657	10	0
Total Commercial Percent	98.15%	1.23%	0.63%	0.00%					
Industrial									
Billing errors	341	2	2	0	345	75.16%	343	2	0
Inaccurate Metering	3	0	0	0	3	0.65%	3	0	0
Wrongful Disconnect	11	0	0	0	11	2.40%	11	0	0
High Bill	6	0	0	0	6	1.31%	6	0	0
Inadequate Service	26	1	0	0	27	5.88%	26	1	0
Service Extension	1	0	0	0	1	0.22%	1	0	0
Service Restoration	66	0	0	0	66	14.38%	66	0	0
Total Industrial	454	3	2	0	459		456	3	0
Total Industrial Percentage	98.91%	0.65%	0.44%	0.00%					
Residential									
Billing errors	36,027	403	489	15	36,934	54.55%	36,901	31	2
Inaccurate Metering	39	0	0	0	39	0.06%	38	1	0
Wrongful Disconnect	13,605	366	335	33	14,339	21.18%	14,332	7	0
High Bill	1,217	34	41	0	1,292	1.91%	1292	0	0
Inadequate Service	12,328	324	366	9	13,027	19.24%	13,003	24	0
Service Extension	32	3	10	0	45	0.07%	45	0	0
Service Restoration	1,937	35	61	2	2,035	3.01%	2,033	2	0
Total Residential	65,185	1,165	1,302	59	67,711		67,644	65	2
Total Residential Percentage	96.27%	1.72%	1.92%	0.09%					
Total State of Minnesota	69,238	1,213	1,327	59	71,837		71,757	78	2
Total ST of MN Percentage	96.38%	1.69%	1.85%	0.08%					

**Xcel Energy
Customer Complaint Report
November, 2013**

**Turnaround Days for
Closing a Complaint**

	Agree	Compromise	Demonstrate	Refuse	Total	%	Initial Inquiry	within 10 days	Longer than 10 days	
Commercial										
Billing errors	2,245	21	12	1	2,279	77.39%	2,274	5	0	
Inaccurate Metering	11	0	0	0	11	0.37%	11	0	0	
Wrongful Disconnect	163	2	2	0	167	5.67%	166	1	0	
High Bill	36	1	0	0	37	1.26%	35	2	0	
Inadequate Service	241	5	3	0	249	8.46%	249	0	0	
Service Extension	2	0	0	0	2	0.07%	2	0	0	
Service Restoration	193	5	2	0	200	6.79%	200	0	0	
Total Commercial	2,891	34	19	1	2,945		2,937	8	0	
Total Commercial Percent	98.17%	1.15%	0.65%	0.03%						
Industrial										
Billing errors	279	2	0	0	281	79.83%	281	0	0	
Inaccurate Metering	0	0	0	0	0	0.00%	0	0	0	
Wrongful Disconnect	3	0	0	0	3	0.85%	3	0	0	
High Bill	7	0	1	0	8	2.27%	8	0	0	
Inadequate Service	23	1	0	0	24	6.82%	24	0	0	
Service Extension	0	0	0	0	0	0.00%	0	0	0	
Service Restoration	36	0	0	0	36	10.23%	36	0	0	
Total Industrial	348	3	1	0	352		352	0	0	
Total Industrial Percentage	98.86%	0.85%	0.28%	0.00%						
Residential										
Billing errors	32,736	483	352	18	33,589	59.00%	33,540	47	1	
Inaccurate Metering	36	1	1	0	38	0.07%	38	0	0	
Wrongful Disconnect	10,097	254	251	22	10,624	18.66%	10,620	1	0	
High Bill	556	19	23	1	599	1.05%	598	1	0	
Inadequate Service	10,324	222	255	9	10,810	18.99%	10,805	5	0	
Service Extension	11	1	4	0	16	0.03%	16	0	0	
Service Restoration	1,187	29	36	0	1,252	2.20%	1,252	0	0	
Total Residential	54,947	1,009	922	50	56,928		56,869	54	1	
Total Residential Percentage	96.52%	1.77%	1.62%	0.09%						
Total State of Minnesota	58,186	1,046	942	51	60,225		60,158	62	1	
Total ST of MN Percentage	96.61%	1.74%	1.56%	0.08%						

**Xcel Energy
Customer Complaint Report
December, 2013**

	Agree	Compromise	Demonstrate	Refuse	Total	%	Turnaround Days for Closing a Complaint		
							Initial Inquiry	within 10 days	Longer than 10 days
Commercial									
Billing errors	2,358	21	14	1	2,394	79.69%	2,389	5	0
Inaccurate Metering	2	0	0	0	2	0.07%	2	0	0
Wrongful Disconnect	150	1	4	0	155	5.16%	154	0	0
High Bill	45	1	1	0	47	1.56%	47	0	0
Inadequate Service	217	5	1	1	224	7.46%	221	3	0
Service Extension	0	0	0	0	0	0.00%	0	0	0
Service Restoration	179	1	2	0	182	6.06%	181	1	0
Total Commercial	2,951	29	22	2	3,004		2,994	9	0
Total Commercial Percentage	98.24%	0.97%	0.73%	0.07%					
Industrial									
Billing errors	267	1	2	0	270	78.49%	270	0	0
Inaccurate Metering	2	0	0	0	2	0.58%	2	0	0
Wrongful Disconnect	8	0	0	0	8	2.33%	7	1	0
High Bill	0	0	0	0	0	0.00%	0	0	0
Inadequate Service	21	1	0	0	22	6.40%	22	0	0
Service Extension	0	0	0	0	0	0.00%	0	0	0
Service Restoration	41	1	0	0	42	12.21%	42	0	0
Total Industrial	339	3	2	0	344		343	1	0
Total Industrial Percentage	98.55%	0.87%	0.58%	0.00%					
Residential									
Billing errors	34634	377	262	12	35,285	62.76%	35,259	22	4
Inaccurate Metering	33	0	1	0	34	0.06%	34	0	0
Wrongful Disconnect	8,255	248	220	14	8,737	15.54%	8,727	5	1
High Bill	796	14	18	4	832	1.48%	832	0	0
Inadequate Service	9,387	168	178	6	9,739	17.32%	9,732	3	1
Service Extension	9	1	2	0	12	0.02%	11	1	0
Service Restoration	1,528	28	23	0	1,579	2.81%	1,578	1	0
Total Residential	54,642	836	704	36	56,218		56,173	32	6
Total Residential Percentage	97.20%	1.49%	1.25%	0.06%					
Total State of Minnesota	57,932	868	728	38	59,566		59,510	42	6
Total ST of MN Percentage	97.26%	1.46%	1.22%	0.06%					

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger	Chair
David Boyd	Commissioner
Nancy Lange	Commissioner
Dan Lipschultz	Commissioner
Betsy Wergin	Commissioner

IN THE MATTER OF COMMISSION
CONSIDERATION OF STANDARDS RELATED
TO SMART GRID INVESTMENTS AND
INFORMATION UNDER THE FEDERAL
INDEPENDENCE AND SECURITY ACT OF
2007

DOCKET NO. E999/CI-08-948

ANNUAL REPORT

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission this Annual Smartgrid Report for the 2013 calendar year. We submit this Report pursuant to the Commission’s June 5, 2009 Order and March 4, 2011 Notice in this Docket and note that we concurrently filed this report as part of our April 1 Electric Service Quality Annual Report under the Minnesota Rules.

We respectfully request the Commission accept our 2013 report, which includes the following information, in compliance with the Commission’s Order and Notice:

- Past, current, and planned smart grid projects, specifically including:
 - A description;
 - Total costs;
 - Cost effectiveness;
 - Improved reliability, security, system performance; and
 - Societal benefit.
- “Smart” functions enabled with existing infrastructure and systems (including what percentage of the utility’s meters are currently mechanical, AMR, or AMI, and a sentence on the capability of each);
- Planned or completed system improvements which could affect customer

service, power quality, or service quality metrics;

- Current customer access to data (such as usage or outage data) and how that data educates customers; any planned additional customer access to data;
- Time-varying rates and demand response; and
- The general costs of completed or planned projects (include the costs of changes to billing systems and, if applicable, the early retirement of meters or other equipment) compared to the benefits realized or expected to be realized.

We additionally provide an expanded discussion of Electric Vehicle initiatives, in response to previously-expressed interest in this topic in this docket.

ANNUAL REPORT

Change is underway in our industry, including technological advances, environmental pressures, and increasing customer expectations. At the same time, operating our system is a complex matter. Therefore, while technology is enabling a smarter and more resilient electric power grid, it is critical that we take a measured approach to harvest the best value for our customers as we identify new and better ways to provide our customers with high quality service, meet increasing environmental requirements, and implement advancements and standardized processes that enhance the overall safety of our operations.

Smartgrid has been described as the integration of a communications network with electrical and natural gas equipment, resulting in overall improved efficiencies, management capabilities, and customer value for the electric and natural gas systems. Our approach to “smart grid” is to learn from the current deployments, both internal to Xcel Energy Inc. and within the industry, and implement initiatives at the pace of value to our customers and operations. In this report, we discuss emerging and ongoing initiatives that relate to “smart” functions and capabilities, as well as initiatives that relate to the changes that are underway in our industry.

A. New and Emerging Initiatives

We generally discuss our new and emerging initiatives in this section. We discuss our existing intelligent infrastructure and any related 2013 updates in Section B of this Annual Report.

1. *Network Communications Strategy*

In our most recent Annual Report, we discussed an effort we had undertaken to define a strategy that would support our current and expected future data needs for our transmission and distribution substations, distribution system automation, natural gas and electric meter reading, and natural gas operations. We noted that the network would need to incorporate multiple levels of communications architecture to securely and efficiently handle the varying data needs of these essential Company operations.

In 2013, we completed the work on our strategy, and developed a framework within which we expect to:

- Ensure security and compliance;
- Leverage our current assets;
- Increase the speed, reliability and access to operational data; and
- Optimize performance monitoring and response while controlling cost.

In developing this framework, we used our knowledge and experience gained from previous deployments, other utilities, and vendors – combined with our objective of fully leveraging the assets we already have in place. We also factored-in the need and challenges associated with preparing the distribution system for the impacts of increasing amounts of Distributed Generation (DG). We answered questions such as: (1) how we manage the complexities of differing communications and equipment infrastructure in the different operating companies; (2) how we ensure the most cost-effective, secure, and value-added network possible; and (3) how we best manage the costs of the system preparations associated with DG, such that they are incurred as close as possible to the actual deployments of DG.

Finally, we recognized that it would be vital that cyber- and physical-security be designed-in, and not added as an afterthought or in a reactive manner. This is especially critical as the technologies used in our operational and information systems converge. In the past, when these areas had very different underlying technologies, there was an additional measure of security provided by the dissimilarity. However, in a converged and standardized environment, only a well thought out and implemented multi-layer security environment will protect our critical assets.

a. *Our Network Communication Strategy*

Our Network Communication Strategy is to update our communications infrastructure in incremental steps based on a common set of design, control, and security principles. These steps will ensure that all field data passes through Hubs (the

appropriate *substation* for electric and *pressure regulator* in the case of natural gas) and then to central systems, using the most cost-effective transport, so that in the future, as the Hubs become increasingly intelligent, they can facilitate decisions and actions closer to where the system conditions and events are occurring in the field. Our Network Communications Strategy provides the foundation for our continued implementation of smart technologies that benefit the Company and our customers.

b. How the New Strategy Differs

Previously, we implemented networks using a *functional* approach, with each network optimized for a particular environment (electric SCADA, gas SCADA, device monitoring, etc.), and typically sending the data from the field to a central system. While this was very effective for the conditions at the time they were constructed, in the future, and particularly with greatly expanded DG on the system, it will be essential for the system to make decisions much closer to the conditions occurring in the field. This is necessary in order to respond in a secure and appropriate manner that protects the rest of the system.

To achieve our new strategy, we need to be able to transport massive amounts of data between numerous field locations while managing our costs. We believe the Hub concept is the most cost-effective way to achieve the levels of field/operational intelligence we now anticipate, as well as to support the further operational intelligence inevitable in our industry – and that will be necessary to identify new and better ways to provide our customers with high quality service, meet increasing environmental requirements, and implement advancements and standardized processes that enhance the overall safety of our operations.

c. Implementing the Strategy

As part of our strategy work in 2013, we decided that we must first establish a new operational model for network communications that will scale and support business initiatives as they are implemented. The Principles that provide the framework for implementation of our Network Strategy and communications model are as follows:

- Maximize leverage of our assets, while optimizing public carriers;
- Design multilayer security and compliance into the systems from the start;
- Have a single point of control and monitoring (i.e., operations center);
- Hub all field data through substations;
- Use common tools, processes, equipment templates and standards across the enterprise;

- Have a clear governance model that supports cross-functional alignment;
- Design for redundancy, multiuse, and traffic control;
- Maximize cross-functional joint use of facilities; and
- Implement at the speed of value to our customers, with business requirements driving deployment.

With our strategy in place and the structure of a new scalable operating model near completion, we are positioned to execute incremental initiatives that we believe will deliver the greatest value to the Company and our customers. Our initial initiative will introduce a common Network Operations Center (NOC) as a point of control and “incident management” for all operational communications, regardless of which functional area of the company operates them. In parallel, we are also building a common set of tools for planning, designing, monitoring and troubleshooting our communications systems.

We then expect to turn our attention to increasing our communication capabilities with our Hubs, using our own fiber optic assets. This increase in capabilities will help us make more informed, real-time decisions on our electric transmission loads, and increase our effectiveness in predicting faults, rather than reacting to them after they occur. Further, we will work with the operational business areas as they identify opportunities to increase their operational capabilities through increased system intelligence, such as the initiatives discussed in Part 2 of this section, and implement those initiatives at the speed of value to customers. We continue to believe it is important to take a measured, incremental approach to ensure that we balance cost with our need to continue to meet our reliability requirements and provide our customers with high quality service.

d. Expected Benefits

We continue to expect the primary benefit of implementing a comprehensive communications network to be improved efficiency through increased standardization, monitoring and remote control of our system in a secure manner. For example, we expect to consolidate existing field area networks, and leverage our substations as communications hubs, aggregating data from field devices; this reduces the number of separate networks that must be monitored and maintained. Additionally, as with any change, we will take advantage of the opportunity to ensure we are applying the latest security protocols. Our network strategy will continue to be a key foundational program for our continued implementation of smart technologies that benefit the Company and our customers.

2. *Enhanced System Monitoring and Control*

We use an Energy Management System (EMS) to monitor and manage the automated devices on our distribution and transmission systems. The Supervisory Control and Data Acquisition (SCADA) element is the primary function of the EMS, and is shared by transmission and distribution. SCADA facilitates real time two-way communications from field devices, and provides Transmission and Distribution Operations the ability to remotely control the flow of electricity during outage and maintenance periods, and collect information about the health of the system.¹

We have determined that it is necessary to replace our current EMS, which was originally installed in the mid-1990s. The level of customization we have had to do to the system to meet the changing transmission regulatory environment and market structure has undermined the system's reliability, and caused Critical Infrastructure Protection (CIP) compliance and security challenges. The new generation of EMS builds-in CIP as a fundamental part of the design, as opposed to the "bolt-on" approach that we have had to take with our 1990's vintage EMS. In addition, the latest generation of EMS contains many enhanced functional improvements in the basic SCADA function, and improved support for advanced application functions that standardize Operator capabilities and approach, as well as adding additional functionality regarding circuit management.

We selected General Electric's PowerOn Advantage EMS, and are currently developing the database and user graphic displays for the NSP System (NSPM and NSPW transmission, generation and distribution facilities). During 2014, the project will progress through testing, and is expected to go-live in early 2015. We summarize the SCADA functionality of the EMS in Part a below, and discuss some of the advanced functions that the transmission and distribution operational areas are planning and implementing in Parts b and c below.

a. SCADA Functionality

In summary, our SCADA system provides information to control center operators regarding the state of the system, and alerts when system disturbances occur, including outages. Every few seconds, it provides system status information, such as normal operating parameters for our generation and substation facilities. It also immediately notifies an Operator of disturbance types (sustained or momentary event), so that system impacts can be assessed and operations can take appropriate

¹ The transmission system is fully automated, and currently, the distribution system is generally automated at the Feeder level and above.

action to restore service to our customers. Our SCADA system also monitors and collects system performance information for Feeders and Substations. This information is used by transmission and distribution operations to ensure the system is safely and efficiently operating within its capabilities. The performance information is also used by planning Engineers to perform load and operating analyses to establish system improvement programs that ensure we adequately meet load additions and continue to provide our customers with strong reliability.

In summary, our use of SCADA technology improves outage restoration, system performance, and planning engineering, which translates to providing safe, reliable, and adequate service to our customers. In our 2012 Annual Report, we noted that we expected to enable and integrate a portion of SCADA information into our Network Management System (NMS, f/k/a Outage Management System or OMS). However, we are now planning to implement an Advanced Distribution Management System (ADMS), which will integrate SCADA, NMS, and several other systems to provide a robust decision support system to assist control center, field, and engineering personnel with the monitoring, control and optimization of the distribution system. We discuss ADMS in Part c of this section.

b. Advanced Transmission Functions

The coverage of the GE EMS is similar to our current EMS, with one minor exception – the real-time energy scheduling and hourly energy accounting for Midcontinent Independent System Operator (MISO) market settlement. These functions tend to be unique to each utility, so are not standard components of EMS software. We are therefore separately developing these functions in parallel with the EMS development in a new consolidated Integrated Energy Management (IEM) system. We believe separately developing these energy accounting functions provides improved ability to focus on the development of core EMS/SCADA and IEM functionality, and increases our ability to manage the risk associated with transitioning to the new EMS/SCADA system.

A couple of the advanced applications we are developing in conjunction with the EMS/SCADA system are Network Connectivity Analysis (NCA) and Operator Training Simulator (OTS). The NCA creates a model of the electrical system connectivity every five minutes and tests 500 scenario contingencies. This gives Operators and opportunity to see any voltage excursions and any lines that may be overloaded – allowing them to take action to avoid an event occurring on the system.

The OTS is able to simulate events, including past actual events for training purposes. We use OTS as part of our annual training and reliability drills – and note that we

used this system in conjunction with our participation in the North American Electric Reliability Corporation (NERC) GridEX II national grid security exercise in November 2013. GridEX II was the largest, most comprehensive effort addressing security by the electricity industry to-date, and included over 234 organizations with more than 2,000 individuals as well as government agencies such as the Department of Homeland Security, FBI, and Department of Energy (DOE). It was a simulation of a coordinated cyber and physical attack on the bulk power system, impacting corporate and control networks and concurrent physical attack that degraded reliability and threatened public health and safety.²

The forecasted NSP System costs of the new EMS/SCADA and IEM are approximately \$12.4 million.

c. Advanced Distribution Management System

Also concurrent with development of the new EMS/SCADA, we are planning an Advanced Distribution Management System (ADMS) project, which is the distribution equivalent to the advanced transmission functions discussed in Part b above. One of its functions will be to integrate with the EMS/SCADA to provide an integrated operating and decision support system to assist control room, field personnel, and engineers with the monitoring, control and optimization of the distribution system. While some elements of the transmission and distribution system benefit from an integrated SCADA, the ADMS SCADA integration will increase the ability of distribution operations to manage and monitor those elements that are unique to the distribution system.

While our current distribution SCADA capabilities go to the Feeder level, with ADMS, we will be able to implement automation to the Tap level on some portions of our system.³ In addition to the enhanced SCADA capabilities, and similar to the advanced application capabilities for transmission, the ADMS will enable the Company to develop applications that aid in managing the complex interactions that are part of both planned and unplanned outage events, feeder switching operations, and device loading.

We are initially investigating two applications enabled by ADMS that we believe will provide the Company and our customers the greatest value: (1) The FLISR application locates faulted sections of the system (Fault Location) then automatically

² See <http://www.nerc.com/pa/CI/CIPOutreach/Pages/GridEX.aspx> for additional information.

³ Taps are one level below Feeders on the Distribution system. In general, Feeders serve thousands of customers and Taps serve hundreds.

isolates the faulted section (Isolation) and restores power to as many customers as possible (Service Restoration), resulting in reduced outage durations for a portion of customers;⁴ and, (2) Integrated Volt Var Optimization (IVVO). Initially IVVO will replace the existing controls to reduce system losses by controlling capacitor banks to improve power factor on feeders. Its controls will also ensure distribution feeder voltage for improved power quality. Finally, it will be capable of integration with voltage regulation equipment, which can then enable voltage reduction to reduce loading during system peak demand and emergency loading situations. We are continuing to explore these applications enabled by the ADMS, and will implement them at the speed of value to our customers.

There are many benefits associated with ADMS to be realized with greater future investments in intelligent electric field devices including *reliability improvements* such as faster restoration times, improved storm response and restoration, and improved outage and restoration information; *power quality monitoring* to quickly identify problems and maintain compliance and equipment performance; *safety measures* such as ensuring distributed generation isolation during outages, decreases in drive time and avoided trips, and improved tagging and switching management; *operational efficiencies* such as reduced fault investigation time, reduced crew time for fault location, isolation and restoration, improved situational and operational awareness, and optimized switching; *conservation and energy efficiency*, such as reduced peak demand and reduced electrical losses; and, *asset optimization* such as improved analytics and remote diagnostics of intelligent equipment.

The NSPM 2013 costs associated with the ADMS planning stage were approximately \$77,000 in Capital and \$30,000 in O&M.

3. *Outage/Network Management System*

In 2012, we completed a significant upgrade of our Network Management System (NMS), which is the system we use to manage planned and unplanned distribution system outage events. Among other things, the upgrade allowed for further leverage of our Automated Meter Reading (AMR) system by integrating our ability determine whether a customer has line-side power directly into NMS. We do this by “pinging” the meter by accessing a field controller that is part of our AMR system, which polls the individual customer’s meter to determine whether it is energized.

⁴ NSPM currently has FLISR capability on certain segments of the system where “teams” of switches communicate with each other to perform the function. FLISR controlled by ADMS will provide enhanced capabilities. We discuss current system intelligence in Section B of this Report.

The pinging itself eliminates crew trips that would have otherwise resulted in an “okay on arrival” outcome. During 2013 in Minnesota, we were able to use this capability to verify that the customers associated with more than 1,000 outage jobs were energized, then cancel those jobs – making this tool a proven critical resource in restoring service to our customers as efficiently and quickly as possible. The integration of this functionality directly into NMS also improved our control center efficiency, as previously, employees had to use a separate system to perform the pinging.

As noted in Item 2 above, the NMS, along with a number of other systems will be integrated into our ADMS, which we expect will further improve our efficiency and service to customers.

4. *Solar on Network Pilot Results*

Secondary distribution networks are used in downtown Minneapolis and St Paul to serve high-density loads with high reliability. The control systems for these networks rely on power flowing toward the customer, a state that can be reversed with distributed generation. While many utilities have disallowed solar/photo-voltaic (PV) distributed generation (DG) on networks for this reason, we approved two installations in 2012 on a pilot basis. We, however, required specific controls be installed to ensure directional power flows remained adequate to forward-bias the controlling relays.⁵ The pilot PV units and their controls have performed well.

Concurrent with this pilot, Xcel Energy engineers created a Network Interconnection Guideline to address the technological concerns while maximizing permissible PV DG. The result provides for somewhat relaxed requirements for future installations. While less restrictive than the initial requirements, the modified requirements are essential to maintaining the integrity of the network. We will be presenting the findings from this pilot in spring 2014 to representatives from Minneapolis, St. Paul, and the Minnesota Department of Commerce.

5. *SolarTAC: Solar-2-Battery and Community Energy Storage*

Xcel Energy and EPRI are currently evaluating two battery energy storage systems at one of the largest dedicated solar research facilities in the United States: the Solar Technology Acceleration Center (SolarTAC) in Aurora, Colorado. Battery energy storage may be a key to increasing the reliability, efficiency, and value of variable renewable generation resources. In particular, the proliferation of solar PV is prompting utilities such as Xcel Energy to investigate effective grid-management

⁵ If forward-bias of the relays is not maintained, the protectors open, which decreases reliability.

techniques for handling high-penetration solar conditions. Both of these multi-year research efforts aim to discern the technical and economic costs and benefits of utilizing energy storage for a range of transmission- and distribution-connected solar applications such as time shifting/peak shaving, ramp rate limiting, power smoothing, and voltage regulation.

Solar-to-Battery. Solar-to-Battery (S2B) is evaluating a 1.5 MW/1.0 MWh advanced lead acid system produced by Xtreme Power. We are assessing their Dynamic Power Resource unit interconnected with a number of concentrating PV arrays for its ability to perform multiple grid support operations at a larger scale. The arrays produce up to 780kW on the local distribution circuit. The support operations we are assessing have the potential to provide economically valuable grid benefits, including distribution upgrade deferrals, system capacity, energy time-shifting, and distribution voltage support.

Community Energy Storage. The Community Energy Storage (CES) project is demonstrating a 25-kW/50-kWh Sodium-Nickel-Chloride battery manufactured by FIAMM SoNick that is affixed to a model solar neighborhood. The solar neighborhood consists of PV arrays, load banks, metering equipment, and other components. We are studying the single-phase AC unit to assess its ability to provide impactful distribution applications at the residential customer level. The system's interconnection with the solar neighborhood along with a dedicated transformer, is intended to simulate real-world conditions that can more accurately portray this battery's various modes of operation.

Both the S2B and CES projects are first-of-a-kind. Currently, the units are successfully operating and generating data for analysis. However, we have encountered unanticipated challenges that have delayed testing. Efforts going forward will focus on executing test plans that we have learned work within the battery systems' limitations, and also discovering their full potential to provide valuable energy storage services at the neighborhood and substation/mid-feeder levels.

6. *High Definition LiDAR Survey and Line Modeling*

Light Detection and Ranging (LiDAR) survey consists of flying a helicopter over transmission lines with a laser to capture the existing conditions in the right-of-way. Additional sensors capture multiple images that are used to create an orthographic imagery, very similar to what is shown in Google Earth, and oblique images, very similar to what is shown in a Google Street View. We use this data to create an accurate GeoReferenced model of the transmission line and other objects in the right-

of-way. From this model, we are able to verify electrical clearances, respond more quickly to storm damage, order materials, and design new construction, which reduces costs and improves reliability of the system.

LiDAR survey provides greater data quality and density than traditional survey, conducted on the ground with a field crew using optical instruments and GPS. In a single aerial pass, LiDAR can capture high definition data for a target corridor up to 300 feet in width, compared to a traditional ground survey that generally acquires a 50 to 100 foot width.

The traditional ground approach requires that we coordinate with landowners for access, and takes several months to survey 30-60 line miles, which we can do with LiDAR in a single day with no burden to landowners. However, the greatest advantages of LiDAR over traditional survey are cost and timeframe. The 2013 cost per mile for LiDAR was \$800, versus a traditional survey cost of \$2,000. This translates to a 2013 savings of \$1.4 million.

We use the same LiDAR data to model the vegetation in the corridor to identify hazard trees, create routine maintenance work plans, and prescribe wildfire protection efforts, which result in reduced costs and increased reliability. Another major benefit the High Definition models are to update our Geographic Information System (GIS) with high accuracy data greatly enhancing the understanding and management of our system.

In 2013, we performed LiDAR on approximately 1,200 transmission line circuit miles in Minnesota. To-date, we have acquired LiDAR data on approximately 3,250 of the 4,000 miles of transmission lines owned and/or operated by Xcel Energy in Minnesota. We plan to continue our efforts to LiDAR survey and model lines as business needs arise, with a goal of ultimately having all transmission lines modeled based on LiDAR acquired data.

7. *Advanced Wind Production Forecasting System*

In 2013, Xcel Energy, already the nation's number one wind energy provider, proposed adding a total of 1,900 megawatts of additional wind resources – a 40 percent increase companywide – with 750 megawatts of that total planned for the NSP System. Ensuring that renewables are efficiently integrated into our operations is an important priority for Xcel Energy.

In 2009, Xcel Energy engaged in a multiyear R&D partnership with the National Center for Atmospheric Research (NCAR) to develop what has become WindWX –

one of the most advanced wind-production forecasting systems in the world. We now contract with Global Weather Corp. (GWC), an affiliate company of NCAR, to continue to host and maintain the system. The present state WindWX system uses real-time, turbine-level operating data and applies complex meteorological algorithms to forecast the amount of wind power that will be produced at all the wind farms throughout the Xcel Energy service territory.

The forecasts, now available worldwide, are designed to help utilities make better commitment and dispatch decisions, including opportunities to power down less-efficient power plants when sufficient winds are forecasted to help meet customer electric demands, and to optimize their market offers in organized markets such as MISO.

In 2013, we completed two full years of operational deployment of WindWX, and have been able to reduce the forecasting error by over 40 percent, and estimate the savings to NSPM customers at approximately \$15.4 million through 2013. Building on previous project successes, Xcel Energy, NCAR, and GWC initiated a third phase of project work during 2013 to further enhance the sophistication of the technology. In this stage, we seek to improve short-term forecasting, focusing on ramping and extreme weather events, and introducing probabilities into the forecasting process.

Over the course of the next two years, NCAR scientists and engineers will develop custom forecasting systems to enable Xcel Energy to improve reliability by better anticipating sudden ramping changes in wind production, as well as better prepare our short-term planning when extreme weather conditions, such as icing, threaten our systems and impact the generation capability of the wind turbines.

Our partnership with NCAR and GWC has gone a long way to help us meet our priority of efficiently integrating renewables into our operations, and we expect our use of the WindWX system to grow the cost savings to our customers.

B. Existing Infrastructure and Programs

Over time, we have implemented a number of strategic projects that have improved the intelligence of the NSPM distribution system that positively affect customer service, power quality and reliability. However, as of now, we do not expect any direct results on our existing service quality metrics. The Network Communications Strategy we discuss in Section A will form the foundation that will allow the Company to expand and further leverage the intelligence of the system, which will allow us to further increase our effectiveness and service to customers. In this section, we discuss

highlights of ongoing projects and intelligent features of our existing infrastructure that we previously implemented, as summarized below:

- *Automated Switch Teams* – automatically restores electric service to a portion of affected customers after an event, reducing the outage time.
- *Remote Fault Indicators* – reduces outage time by enabling restoration on un-faulted portions of the circuit without first making a site visit.
- *Smart Substation* – allows faster restoration times and provides increased system reliability from implementation of modernized technology and the decision-making capabilities it facilitates.
- *SmartVAR* – improves power quality and availability, and reduces system losses, which ultimately reduces fuel costs for all customers.
- *MISO Smart Grid Project* – improves power system reliability and “visibility” through broad-based system monitoring and control.
- *Wind-to-Battery* – could reduce the impacts of wind and potentially solar variability, allowing for improved integration of renewable energy into the grid.

In addition, as discussed in Section A, our NMS now leverages our AMR infrastructure, which has resulted in Company efficiencies and improved service to our customers through more efficient use of our crews.

1. *Automated Switch Teams*

We have installed automated switch teams on portions of our distribution system. These teams automatically sectionalize and isolate the faulted portion of a circuit. After sectionalizing and isolating the fault that is disrupting power on the system, power is restored to the un-faulted portion of the circuit, restoring power to customers on that portion of the circuit. While not being totally “self-healing,” this does allow the maximum number of customers to be automatically restored after an event, leaving fewer customers with a sustained outage.

NSPM now has 74 of these switches operating in Minnesota. We deploy these based on circuit length and customer count, and are currently installing three to five additional switches per year. In 2012, NSPM launched a program to replace all the Remote Terminal Units on switches. This will bring our switches and operating systems to the current available versions, better ensuring proper operation and continued support by the vendor. This project was completed June 1, 2013. Additionally in 2013, we implemented a tracking tool to track the operating status of the teams, and how many Customer Minutes Out (CMO) have been saved by the

switches.⁶ In 2013 these switches saved over 12 million CMO, which is a direct improvement to our customers' reliability experience.

2. *Remote Fault Indicators*

These devices identify high current flow, indicating that there is a fault downstream of the device, which then uses a cellular phone to report that it has seen fault current pass through it. This information is then displayed to the System Operator, who couples it with other information, allowing us to begin restoring power to customers without first physically patrolling the area.

This greatly reduces customer outage time, and enables restoration to begin on the un-faulted portions of the circuit. We deploy these devices at key points on the distribution system at switches and lines that cannot be readily patrolled. NSPM currently has 125 of these devices in use. These devices were installed in the early 2000's. The devices and this technology are reaching the end of their life, so as devices fail, they are being removed from service. We currently are searching for a viable replacement.

3. *Smart Substation*

This leading-edge demonstration project retrofits the existing Merriam Park substation with cutting-edge technology for remote monitoring of critical and non-critical operating data. The project was to have also included an analytics engine that processes massive amounts of data for near real-time decision-making and automated actions. During 2011, we ended our efforts with the vendor that provided this equipment because they were not dedicating sufficient resources toward getting the necessary functionality up and running. So, while we have more robust operating data and increased data capabilities, instead of it being automatically generated, we must acquire the required data for strategic decision-making. We continue to install leading edge technology in our substations that includes capabilities for information storage and other features including Phasor Measurement Units, which provide highly accurate electrical system state to the operators. This operating information will improve our post-event analysis and system state estimation capabilities in our new Energy Management System that we expect to implement in 2015.

⁶ CMO equals the total minutes of a sustained outage event multiplied by the number of customers impacted.

4. *SmartVAR*

In 2010, we implemented a SmartVAR Management pilot program associated with our Energy Innovation Corridor in St. Paul, MN (*See* Docket No. E002/M-09-1488). This pilot project tested the effectiveness of “smart,” or automated, capacitor controls that have two-way communication ability to manage reactive power (Voltage Ampere Reactive power or VARs) on a portion of our distribution system. The automated capacitor control program is fed information from our SCADA system, and based on this information, the capacitor control system switches capacitors on and off to manage reactive power levels on the distribution Feeder. Managing reactive power reduces system losses by increasing system efficiency.

The results of the pilot were very positive, providing improved power quality and availability to customers, as well as reducing emissions through improved line loss reduction. Based on the positive results from the pilot program, in 2012 we began a five-year project to replace all (approximately 2,100) current capacitor controls in NSPM with controllers capable of two-way communication. Through 2013, we have replaced 1,010 controllers and are scheduled to replace an additional 360 controllers in 2014, with similar levels of annual replacements occurring through project completion (December 31, 2016). We note that we provide quarterly and annual updates regarding this initiative in Docket No. E002/M-09-1488. The cost incurred during 2013 was approximately \$900,000.

5. *MISO Smart Grid Project*

In March 2010, the MISO launched a program to install more than 150 high-tech monitoring devices across its footprint that would monitor the state of the electrical grid 30 times each second at these points. The objective for the project is to improve power system reliability and “visibility” through broad-based system monitoring and control.

a. Project Overview

The devices being installed by the Company and other MISO entities are called Synchrophasors. These devices provide precise measurements of what is going on at particular points or segments of the transmission system, which is “time-synced” to the GPS Satellite System, synchronizing the system information across all MISO and other entities nationally. While these devices were beta-tested as stand-alone devices in the 1990s, they have since matured to commercial grade, and their use is further enabled by improvements in network communications capabilities necessary to handle and provide consistent, high-volume data.

This initiative is being conducted in phases, and will generally be on the highest voltage portions of the transmission system. Phase I began in October 2011 and ended March 31, 2013. During that phase, we installed a total of 27 devices in nine substations, 22 of which were installed in eight different substations in Minnesota. Phase II began January 1, 2013 and will end March 31, 2014. During Phase II, we expect to install a total of 30 devices in 10 different substations, again, with the bulk of these devices (28) installed in Minnesota substations (9). As of December 31, 2013, we had installed all 28 of the devices planned for Minnesota as part of this Phase.

MISO is partially funding this initiative through a DOE stimulus grant, with total project costs being funded through the MISO tariff. Therefore, the costs the Company is incurring directly will be reimbursed by MISO. We estimate our total direct costs for this initiative, subject to reimbursement from MISO, will be approximately \$3.3 million; to-date, we have incurred approximately \$2.8 million associated with our participation in this initiative.

b. Synchronphasor Functionality

Synchronphasors capture and provide the following data *30 times per second*: 3-phase current, 3-phase voltage, positive sequence voltage, positive sequence current, frequency, and phase angle data. As noted earlier, this information is time-synced, so all of these devices, regardless of their location or the entity whose system they are installed on, are “in sync.” Comparatively, on the portions of our transmission system that do not have Synchronphasors installed, we receive more limited information, generally on a *4-second* basis: voltage, VARs, and total MW. Further, this information is not time-synced across MISO entities.

c. Benefits of Synchronphasor Technology

Although there are many expected benefits of this technology, an immediate benefit from installation of this technology is a “real-time” gauge of the stress and balance on the transmission system. Without this technology, we must conduct periodic offline studies to determine the operating guidelines for each line. These guidelines provide the parameters that system operators must operate within to ensure that the grid remains stable. Conversely, Synchronphasors measure phase angle data 30 times per second, informing the operators in real-time the level of balance on the system. This real-time information allows the operators to more closely monitor and take more informed actions to balance the system.

Other benefits include improved “event” analysis. By receiving multi-faceted information regarding the power flowing through the system at a given point in time *30 times per second* – synchronized across all entities – we (and others, such as NERC) will be much better-equipped to understand, analyze, and learn from disturbances or other system events.

d. Next Steps

As of December 31, 2013, we have installed 57 devices in 19 substations on our transmission system, 50 of which are in 17 substations in Minnesota. We will be working toward further leveraging of this data into our systems, which will allow us to further assess and realize the expected benefits of this technology.

6. *Wind-to-Battery Storage*

The Wind2Battery (W2B) system became operational in late 2008. This project tested a one-megawatt battery energy storage system connected directly to a wind farm in an effort to store wind energy in batteries and return it to the grid. Fully charged, the battery could power 500 homes for more than seven hours. Benefits include expected long-term emission reductions from increased availability of wind; reduction of impacts of wind variability; modernization of the grid to allow for easier integration of renewable energy sources; and allowing us to meet Minnesota Renewable Energy Standard legislative requirements. *Cost:* Approximately \$4 million.

The W2B project has provided us with experience and information that will allow us to assess and improve upon the viability of scaling-up battery storage on our system as more wind power is added to meet the renewable policies in the states we serve. The original testing has now been completed, and the results of that testing can be found in our final report filed on January 10, 2012 in Docket No. E002/AI-09-379.⁷

We note that during much of 2012 the battery system was shutdown as a precautionary measure at the recommendation of NGK (the battery manufacturer), after we learned of a fire at a similar NGK installation in Japan in 2011. NGK has since conducted a thorough analysis of the situation and its root causes and redesigned the battery modules. All battery modules at our Luverne, MN installation were replaced with brand new modules of the new design, which was completed in November 2012.

⁷ A public version of the report is also available at:
<http://www.xcelenergy.com/staticfiles/xcel/Corporate/Renewable%20Energy%20Grants/Milestone%206%20Final%20Report%20PUBLIC.pdf>

Following completion of the battery module replacements, the energy storage system was placed back in service providing regulation services to store, control and dispatch energy when needed for supply or transmission stability purposes. Late in the third quarter of 2013, the Company initiated some upgrades to the communication system, which took the battery out of service. At the time of this report, we are still completing these upgrades at the site, and expect to be back online soon, at which time we expect to continue to operate the battery in the MISO market.

C. Automated Meter Reading

Our current metering strategy is to leverage our existing Cellnet Automated Meter Reading system and improve related processes. In addition, we continually look for opportunities to leverage existing rates and AMR infrastructure to pilot future programs. It is also our intention to assess how we might utilize the Network Communications Strategy efforts discussed in Section A of this report to improve our cost effectiveness and the viability of various Advance Metering Infrastructure (AMI) technologies in the future.

Currently, our AMR system collects on-cycle automated reads for billing purposes for residential meters and demand meters. It also collects daily reads that can be used for customer account analysis, if needed.⁸ In contrast to AMR, AMI technologies facilitate real-time, on-demand meter reads and other communication with the meters.⁹ Among other things, AMI systems can perform remote service disconnects and reconnects, allow automated net metering, transmit demand-response and load-management messages, and interrogate and control distribution-automation equipment.

Below we provide a chart showing the breakdown of our existing meters by electric/natural gas, customer type, and whether they are AMR-capable.¹⁰ We do not currently have any AMI metering installed in Minnesota.

⁸ The data collected for residential and small commercial customers is typically aggregated kWh consumption. For all customer types, residential, small commercial, commercial or industrial, the type of data collected can be one or a combination of kWh aggregated consumption, on-peak/off-peak kWh, daily peak demand, daily demand off-peak/on-peak readings, and/or reactive energy readings depending on the specific tariff/rates applicable to the customer.

⁹ The Federal Energy Regulatory Commission (FERC) defines AMI as a metering system that records customer consumption hourly or more frequently and that provides for daily or more frequent transmittal of measurements over a communication network to a central collection point.

¹⁰ Data as of December 31, 2013.

Existing Meter Counts and Capabilities State of Minnesota

	Customer	AMR-Capable?		Total
		Yes	No	
Electric	Residential	1,125,763	101	1,125,864
	Commercial	121,885	1,089	122,974
	Industrial	5,129	3,100	8,229
	Government	3,040	404	3,444
Gas	Residential	413,891	1	413,892
	Commercial	34,655	391	35,046
	Industrial	323	179	502
	Government	649	26	675
	Total	1,705,335	5,291	1,710,626

Our current AMR system, which provides automated meter readings for the majority of our customers, has resulted in reduced meter reading costs and resource requirements, and in most cases, more consistent meter reading performance as compared to manual meter reading. In addition, our AMR system provides additional information to the billing, meter reading, and metering departments to better analyze and respond to billing inquiries and potential meter equipment issues. And, as noted in Section A.3 above, we are leveraging our AMR system, which has enhanced our outage management and service restoration capabilities.

D. Customer Access to Data

We collect, use, maintain and share customer-specific data to provide regulated natural gas and electric service to our customers. We are committed to providing our customers with access to their information, protecting our customer's information, and being transparent about our data privacy practices. In this section, we outline the information, programs, and tools we currently offer to our customers, which we believe empowers them to both control and use their information in a number of ways. We note that we are participating in the Commission's proceeding in Docket No. E,G999/CI-12-1244 that is examining the privacy practices of Minnesota's energy utilities. The customer information access and programs we discuss in this section are not generally the focus of that proceeding. We include, however, an overview of our customer data privacy policy as Part 5 of this section.

1. Usage and Billing Data

Residential and small business customers, as well as all public sector customers, are able to view their energy usage through the My Energy portal in My Account on xcelenergy.com. In the portal, customers can track their energy usage and bill information over time, as well as see how their energy consumption compares to other customers similar to them. Customers can access their historical data through Green Button Download My Data functionality, which provides up to five years of monthly usage information in either xml or csv format. Larger customers can view their usage data and account information at xcelenergy.com through My Account, where up to 24 months of usage history can be retrieved in csv format. Customers can also call to request historical usage information, which will be returned in spreadsheet format.

2. *Outage Data*

At xcelenergy.com/outages, we provide customers the ability to view current electric outages on a map; we also provide the start time of the outage, as well as an estimated restoration time. We launched this customer information tool in March 2010. The information provided by this website tool stems from our NMS, and is updated every ten minutes. Customers can zoom into an approximate 2.5 mile area on the map; it does not provide specific premise/address information. The maps provide aerial pictures, a legend indicating the number of customers impacted, and other detailed information to aid customers and the media in understanding the scope and scale of outage events.

3. *Xcel Energy Mobile Access*

In November 2012, Xcel Energy launched a mobile website (*m.xcelenergy.com*) for customers to access Xcel Energy on their smart phones. This mobile website offers all customers visibility to products, services, energy-saving ideas, safety tips and outage information in another convenient, timely, easy-to-use manner via their smart phones. Customers accessing Xcel Energy's main Internet site (xcelenergy.com) from smart phones, are redirected to the mobile website, with an option to instead view the full website.

The main menu on the mobile homepage provides:

- Pay Your Bill
- Outages
- Rebates
- Energy Saving Tips
- Call Before You Dig

- Contact Us
- Colorado Solar
- Link to xcelenergy.com website
- Links to Xcel Energy Facebook, Twitter, YouTube, Blog, Pinterest, LinkedIn

We have identified the most common tasks customers look to complete with us and we have made and continue to make enhancements to ensure these tasks can be performed in a preferred channel through a streamlined delivery. We believe our addition of mobile access to information and ability to interact with the Company meets our customers' expectations and provides significant value.

4. *Energy Feedback Pilot Program*

Energy Feedback transitioned from pilot to program in 2013. The program provides participating customers information about their energy consumption and about how that consumption compares to similar homes nearby. This is an opt-out program that uses the participant and control group to determine how much energy was saved by the participants. As part of the transition from pilot to program, 100,000 new customers were added to the program. Currently the program follows savings from four groups: the original participants, customers who receive only email notifications, participants selected to “refill” the original group, and the newest expansion group.

As mentioned above, the Energy Feedback Pilot became a program in 2013. As part of this transition, the program went from reporting 100 percent of savings to using the Average Savings Method (ASM), under which, the life is assumed to be 1.0 years and energy savings are reduced by 2/3 annually via a Behavior Adjustment for utility goal calculations.

Late in 2013, we filed for and received approval from the Department of Commerce to add Online Energy Feedback as a new measure within the existing Energy Feedback program. These tools and services allow any customer to login through My Account at xcelenergy.com, and see My Energy comparisons to peer energy use, and an online usage analysis that evaluates equipment and savings suggestions similar to an online audit. This tool encourages goal setting and tracks action customers take to save energy and how they are performing against goals. Making these tools available to all customers encourages everyone to engage in behavior-changing activity to save on energy and help the environment. In addition to empowering customers with more interactive tools and services, we will begin to monitor and measure savings attributable to online energy feedback in 2014.

Energy Feedback did not meet its gas and electric savings goals in 2013. We believe this is due in large part to an underestimation of the time needed to ramp up the savings behaviors of the new customer group, which comprised over 50 percent of total participants. The achievement gap is larger for natural gas; as we have noted, our filed gas goals were based on savings projections that were higher than realistically achievable. Finally, the savings reported also reflect an 11-month time frame as opposed to a full calendar year. Because savings are determined using actual customer data and because of the large number of participants, data is unavailable until at least three weeks after the reporting month ends. For this reason, we decided to close the program year with November 2013 results. The 2014 program results will include savings from December 2013, along with a minimal 2013 “true-up” that the vendor calculates. This true-up adjusts savings to account for behavioral program savings that could be attributed to stand-alone rebate program participation.

In addition to the residential program, we plan to launch a Business Energy Feedback Pilot in 2014. This pilot will test the responsiveness of the small/medium business market to behavior-changing recommendations appropriate for the customer’s business segment. We will measure energy savings associated with these Business Energy Feedback reports to determine whether they offer a cost-effective opportunity for additional energy savings and engagement in this traditionally hard-to-reach market sector.

5. Customer Data Privacy Policy Overview

As we noted previously, we collect, use, maintain and share customer-specific data to provide regulated utility service. Absent a legal requirement, we will not further distribute customer-specific data for secondary purposes without first obtaining the customer’s explicit consent. We believe that our data practices appropriately balance our business needs with the customer’s interest in controlling access to their unique information. The data access tools we discuss in this section demonstrate ways that we empower our customers to control and use their energy usage data in several ways.

We are active participants in matters at both the federal and state level addressing issues of customer privacy and data access, including the Commission’s current inquiry in Docket No. E, G-999/CI-12-1344. We believe that it is important to have an open dialog on these issues, as concerns about privacy can negatively impact our relationship with our customers, regulators and other stakeholders. Our goal is to be the trusted provider of our customer’s energy needs, and we recognize that maintaining appropriate data practices is an important aspect of that trust. We look forward to working together with other stakeholders to codify appropriate privacy standards for utilities in Minnesota.

Our current privacy practices are further outlined in our Privacy Policy, which is available through a link at the bottom of every page on our website (xcelenergy.com).

E. Time-Varying Rates and Demand Response

Time-varying rates separate an average standard rate into a lower “off-peak” rate and a higher “on-peak” rate. This provides customers with an economic incentive to shift energy use from higher-cost “on-peak” hours into lower-priced “off-peak” hours. Demand response rates provide a rate discount as an incentive for customers to agree to curtail their usage during Company-declared system-peak conditions.

1. Time-Varying Rates

Xcel Energy offers time-varying rates to both residential and business customers. The residential Time-of-Day (TOD) rate is optional. TOD rates are mandatory for business customers with peak loads of 1,000 kW or greater, and are optional for other business customers. We discuss our various TOD rates below.

a. Residential Time-of-Day Rate

As an optional alternative to Residential Service, Residential TOD Service rates apply to all household energy usage. This optional service provides a discounted rate to customers for their energy used during off-peak hours. The off-peak rate is approximately one-third of the standard residential base rates, while the on-peak rate is approximately twice the standard rates, but varies based on season and heating type.

This TOD rate option typically reduces electric bills for customers that use at least 650 kWh/month, and that have electric heat or water heating or other major loads that can be shifted off-peak. To experience savings on this rate option, customers must use approximately 65 percent or more of their overall electric usage during off-peak periods, which are 9:00 PM to 9:00 AM weekdays and all hours on weekends and specific holidays.

A three-month trial period for Time-of-Day service is available to residential customers. Customers that choose to return to non-Time-of-Day service after the trial period are responsible to pay a charge of \$20.00 for removal of the Time-of-Day metering equipment.

After the trial period, customers electing the TOD rate option must remain on the rate for 12 months. Currently, 392 Minnesota customers are enrolled in our

residential TOD option.

As we also discuss in Section F below, we continue to promote our existing TOD rate options to electric vehicle (EV) drivers to encourage charging during off-peak times, ensuring they are aware of the opportunity to reduce bill impacts associated with vehicle charging. The Company may also benefit from our EV customers participating in the TOD rate options, in that it may help mitigate potential stress to the distribution system caused by EV charging.

b. Business Time-of-Day Rates

We have three Business TOD Rate options that provide discounted rates to non-residential customers for their energy used during off-peak hours.

- *Small General TOD.* This rate option is available to non-residential customers with a maximum load less than 25 kW. Customers may elect this TOD rate for a trial period of three months. If a customer chooses to return to non-TOD service after the trial period, there is a \$25 charge for the removal of the TOD metering equipment. We currently have 10,001 customers on this rate.

Demand-metered non-residential customers that have a peak load of 1,000 kW or greater for at least four of the past 12 consecutive months must take a TOD service schedule – either General Service TOD or Peak Controlled TOD. Customers choosing the Peak Controlled TOD rate receive a demand charge discount in exchange for agreeing to control their demand to a pre-determined level when Xcel Energy calls for such control. Additional applications of the General TOD and Peak and Energy Controlled TOD services are as follows:

- *General TOD Service.* Non-residential customers with demand metering that are not required to be on a TOD rate may elect to take TOD service. We currently have a total of 3,850 customers on this rate.
- *Peak and Energy Controlled TOD.* This rate is available to non-residential customers with a minimum controllable demand of 50 kW, who agree to control their demand to a pre-determined level when Xcel Energy calls for such control. We currently have a total of 2,022 customers on these rates. Customers on these rates receive up to a 54 percent reduction on the demand charge for their controllable load, at the secondary voltage service level. Under the Energy Controlled rider option, customers also receive a reduced kWh rate on their controllable load, in exchange for more hours that the Company can potentially interrupt their load.

c. Limited Off Peak Rate

The Limited Off Peak rate option offers a reduced energy rate to residential and small commercial customers for specific electric equipment operating between 10:00 PM and 6:30 AM, seven days a week. Two installed electric meters allow for the standard kWh rate to be applied to energy recorded on the first meter for regular household usage while the lower rate is applied to energy recorded on the second meter for specific appliances. Customers with electric thermal storage heating, radiant floor heat, or electric water heaters that store electric heat during off-peak periods for use during the next day's on-peak period will benefit the most.

To take advantage of savings that this rate offers to certain customers, customers must pay an additional monthly service charge for the additional metering and billing requirements. Also, customers are subject to a \$0.26/kWh charge for any energy use that is served through the off-peak meter that is outside the authorized off-peak period. Customers must remain on this rate for a minimum of twelve months, unless they transfer to another interruptible service rate. Currently, 465 Minnesota customers (380 residential, 85 commercial) are enrolled in the Limited Off Peak rate option.

d. Real Time Pricing Service

The RTP rate option is available to customers with a minimum peak load of 1,000 kW. RTP service includes energy charges for eight different types of days, with six different pricing periods within each day-type. RTP customers select a contract demand level for demand billing and pay an additional energy charge for loads over that level except for the two lowest priced day-types. This design provides pricing incentives that are closely matched to both high and low cost conditions. There is currently one customer with two accounts enrolled in this program.

2. *Demand Response Programs & Interruptible Rates*

Xcel Energy has three electric load management programs as follows: (1) Electric Rate Savings; (2) Saver's Switch; and (3) Energy Controlled Service. These programs provide customers rate discounts for reducing electric load on days having peak demand for electricity. The table below identifies the current contracted customer load and customer participation for each program.

Demand Response and Interruptible Rates Participation State of Minnesota

Program	Controlled Load (MW)	Customers
Electric Rate Savings Program	488	2,025
Saver's Switch-Business Customers	45	15,917
Saver's Switch-Residential Customers	229	376,858
Energy Controlled Service	n/a	3,092
TOTAL	762	397,892

Data as of December 31, 2013.

a. Electric Rate Savings Program

The Electric Rate Savings Program is marketed as the Peak Controlled and Energy Controlled Rates to customers. Participants receive a monthly discount on their demand charges in return for reducing electric loads when notified by Xcel Energy. Customers on the Energy Controlled rate also receive a reduced kWh rate on their controllable load, in exchange for more hours that the Company can potentially interrupt their load. Customers must be able to reduce their electric loads by a minimum of 50kW on control days. Participants save as much as 58 percent on secondary voltage demand charges over the entire year for the demand they commit to reduce during control periods. Minnesota participation in this program in 2013 was approximately 2,025 customers.

b. Saver's Switch – Business Customers

Saver's Switch for business customers is a direct load control program. Participating customers receive a monthly discount of \$5 per enrolled ton of air conditioning during the months of June through September. In exchange, Xcel Energy has the ability to control electric central air conditioners on days of peak electric demand. Minnesota participation in this program in 2013 was approximately 15,900 customers.

c. Saver's Switch – Residential Customers

Saver's Switch for residential customers is a load management program that provides direct load control of central air conditioners and electric water heaters. Participants in the central air conditioning program receive a 15 percent discount on their June through September electric energy and fuel cost charges. These participants are eligible to receive an additional two percent discount for enrolling their electric water heater. Water heaters can be controlled year-round, and the associated water heater

discount applies year-round as well. Minnesota participation in this program in 2013 was approximately 377,000 customers.

d. Energy Controlled Service (Non-Demand Metered)

We additionally offer a program for new or existing Minnesota electric customers (Rate A05), whose home or business has a primary electric heat source and an alternative fossil fuel heat source. The program offers customers the opportunity to save money on their electric heating costs by allowing Xcel Energy to control (interrupt) their primary electric heat source, during peak heating times (October – May). During an interruption, customers must be able to switch to their backup/dual fuel heat source. There are two options: Standard energy control rate and Optional energy control rate (allows Heat Pumps to be controlled during the summer months). Minnesota participation in this program in 2013 was 3,092 customers.

F. Electric Vehicles

The Commission has previously expressed interest in EV initiatives as part of this docket, so we provide an expanded EV discussion below, updated for this 2013 report:

We believe utilities will necessarily play a critical role in enabling alternative transportation markets. In 2013, leading automotive manufacturers developed additional EV models to provide to the public for passenger vehicles, as well as medium and heavy duty options for business-oriented use. While EVs have seen double-digit growth, adoption appears to be following the slower growth scenarios, as indicated on previous industry projections.¹¹ Still, based on customer interest and industry development, Xcel Energy continues to anticipate future needs to fulfill the role of providing the energy to power alternative fuel vehicles in a safe, reliable, and cost-effective manner.

1. *EVs at Xcel Energy*

Since 2011, Xcel Energy has had a “Repowering Transportation” team that includes representatives from across the Company, to assess and prepare for the greater utilization of EVs and other alternative fuel vehicles, such as Compressed Natural Gas (CNG). The team has been charged with developing and implementing a comprehensive strategy to address clean transportation issues.

¹¹ Electric Drive Transportation Association tracked 52,835 plug in electric vehicle sales in 2012 and 96,702 in 2013. See <http://electricdrive.org/index.php?ht=d/sp/i/20952/pid/20952>

In 2013, we continued to implement the communications program the team developed to educate our customers, and engage with other interested stakeholders. We use xcelenergy.com, the Connect Blog, printed brochures and other materials to provide relevant information about electric vehicle programs, technologies, and news.¹² We have, and will continue, to adopt alternative vehicles into our own fleet, to investigate the impacts of EVs on our distribution system, and to develop collaborative relationships with external stakeholders. In 2013, we observed a full year of the fee-based employee charging pilot program we developed in 2012 to improve our understanding of costs and benefits associated with businesses offering EV charging services to employees. We plan to continue the pilot as more employees adopt electric vehicles.

2. *Collaboration*

We continue to participate in Drive Electric Minnesota (DEM), which is a partnership among Xcel Energy, local and state governments, as well as private and non-profit business entities working to bring electric vehicles and plug-in charging infrastructure to Minnesota. DEM's goals include encouraging the deployment of EVs and the establishment of a charging station infrastructure.

Through the Chairman's fund in 2010 and 2011, Xcel Energy has collaborated with DEM to help facilitate purchases of 14 Transit Connect electric vehicles for demonstration in highly visible fleets. Additionally, in 2012 and 2013, Xcel Energy supported the installation of 92 public charging stations in key locations at city, university, and public transit locations by leveraging an Xcel Energy contribution with additional federal and local grant funds. The Company continues to work with DEM to complete the installation of these charging stations while also promoting the Zero Emissions Challenge to encourage renewable energy offsets for the charging stations.¹³

3. *Utility System Impacts*

In the small but growing EV industry, adoption rates of electric vehicles are still uncertain. Building upon external projections and using an econometrics model, the Company created a projection of the demand and energy sales impact of EVs in NSPM's service territory. Using these projections and peak transformer load data, we have analyzed scenarios representing different penetration levels of EVs.

¹² We note that we additionally provide educational materials regarding natural gas vehicles.

¹³ See <http://www.energyinnovationcorridor.com/page/showcase/drive-electric-mn/>

We continue to expect generation and transmission capacity will be sufficient to meet demand, even under aggressive scenarios over the short- and medium-terms. While we expect EVs to represent a higher than normal load increase, we believe that we will be able to effectively manage the total load that they may put on our system. We are accustomed to dealing with increasing loads, and have the tools and practices in place to make the capacity planning decisions necessary to accommodate the additional load caused by EV charging.

However, although we expect generation and transmission capacity to be sufficient, actual distribution system impacts are difficult to predict due to unknowable details. Our analysis indicates that there are potential impacts to the distribution system, the extent of which will depend on customer EV adoption levels and the geographic patterns/clustering that occurs.¹⁴ However, we are aware and taking additional steps such as collaborating with auto manufacturers to gather information on the geographic location of EVs for planning and mitigation of system impacts.

The electric infrastructure exists today to fuel EVs. As customer adoption of EVs rises, we will continue to closely monitor and manage transformer loading and other system impacts stemming from the incremental load from EV charging.

4. *Customer Charging Behavior and Programs*

When customers increase their usage of electricity, the cost to a utility (and ultimately other customers) depends upon the point(s) at which the increased usage occurs. While it appears that the majority of EV charging activity is occurring at drivers' residences, public and workplace charging options continue to increase.

As noted previously, we continue to market our existing TOD rate option to EV drivers, to encourage charging during off-peak times. This has the potential to provide both customer and Company benefits. Customers have the opportunity to reduce bill impacts, and customer enrollment in TOD options may allow the Company to mitigate potential stress to the distribution system caused by EV charging.

We have also developed a marketing campaign, *Drive with GUST-o*, which educates our EV-owning customers how they can power their vehicle with Windsource for emissions-free driving at home. And, as noted above, the DEM Zero Emissions

¹⁴ An EV charging at 6.6 kW (Level 2 charger) is similar to the peak load of an entire home. Distribution transformers generally serve between 5-15 homes; depending on the existing transformer load, incremental load from multiple EVs could cause the transformer to overload.

Challenge initiative targets WindSource participation for public charging infrastructure in public and workplace locations.

We desire to support customers in their adoption of technologies that will help them manage their environmental impact and energy use, whether that is for their home or transportation. NSPM will continue monitor EV-related activities throughout the United States and evaluate opportunities to provide EV-related programs that are cost-effective for both our EV-owner customers and other customers.

5. *EV impact on "Smartgrid"*

Based on our current knowledge, we do not believe that Smartgrid technologies, such as smart meters, or transformer monitoring, are essential to reducing the short-term impact of EVs on our system. However, we do believe that these technologies would assist in discovering or anticipating issues on the local distribution grid and could provide benefits to both EV owners and the Company. Any system issues resulting from EV charging are dependent on adoption rates and charging behavior, which today are not fully understood due to the stage at which we are in Minnesota.

Customer behavior modifications, such as charging vehicles off-peak, may be sufficient to mitigate any issues and may not require Smartgrid technology, depending on its form. We are continuing to monitor and participate in customer behavior studies that will provide more information on EV impacts and mitigation strategies. As with any system modification or modernization, we will evaluate and balance the cost-effectiveness of emerging technologies to ensure it will provide value to our customers.

CONCLUSION

Xcel Energy respectfully requests the Commission accept this 2013 Annual Report.

Dated: April 1, 2014

Northern States Power Company

RESPECTFULLY SUBMITTED,

/s/

By: _____

PAUL J LEHMAN

MANAGER, REGULATORY COMPLIANCE & FILINGS

	2009	2010	2011	2012	2013	Straight 5 Year Avg CAIDI using SAIDI/SAIFI Proposed Standards for 2013	5 Year Median	Avg after Removing High and Low	Lowest of 3 Methods	
							Proposed Standards for 2013	Proposed Standards for 2013	Proposed Standards for 2013	
Metro East										
SAIFI	0.73	1.15	0.78	0.91	0.83	0.88	0.83	0.84	0.83	
CAIDI	101.87	76.87	89.61	108.36	97.75	93.72	97.75	96.41	93.72	
SAIDI	74.21	88.30	69.89	98.35	81.28	82.41	81.28	81.26	81.26	
							CAIDI using SAIDI/SAIFI	97.75	96.78	97.72
Metro West						Proposed Standards for 2013	Proposed Standards for 2013	Proposed Standards for 2013	Proposed Standards for 2013	
SAIFI	0.79	1.19	0.87	0.98	0.94	0.95	0.94	0.93	0.93	
CAIDI	106.58	96.49	98.20	105.93	105.09	102.11	105.09	103.07	102.11	
SAIDI	84.43	114.85	85.07	103.98	98.71	97.41	98.71	95.92	95.92	
							CAIDI using SAIDI/SAIFI	105.09	103.25	103.25
Northwest						Proposed Standards for 2013	Proposed Standards for 2013	Proposed Standards for 2013	Proposed Standards for 2013	
SAIFI	0.65	0.77	0.85	0.84	0.93	0.81	0.84	0.82	0.81	
CAIDI	96.21	108.70	122.13	125.62	102.86	111.70	108.70	111.23	108.70	
SAIDI	62.07	84.02	103.27	106.07	95.90	90.27	95.90	94.40	90.27	
							CAIDI using SAIDI/SAIFI	113.59	114.98	111.70
Southeast						Proposed Standards for 2013	Proposed Standards for 2013	Proposed Standards for 2013	Proposed Standards for 2013	
SAIFI	0.63	0.86	0.72	0.59	0.75	0.71	0.72	0.70	0.70	
CAIDI	110.06	121.07	107.92	120.50	145.11	121.42	120.50	117.21	117.21	
SAIDI	69.37	103.67	78.15	71.54	108.83	86.31	78.15	84.45	78.15	
							CAIDI using SAIDI/SAIFI	107.92	120.39	111.40

Notes:
Each year's calculations use storm day thresholds based on the prior five years of outage history.
Calculations are based on the number of customers who receive a bill.
SD Divisional feeders serving Minnesota customers are included in Southeast region
ND Divisional feeders serving Minnesota customers are included in Northwest region
Partial Customer Minutes includes all levels and is the amount saved from overall customer minutes.

Based on Annual Rules Method

Metro East	2013 Actual	2013 Targets				2012 Actual	2011 Actual	2010 Actual	2009 Actual	2008 Actual
		Approved (5 Year Avg)	5 Yr Median	5 Yr Avg after removing Hi & Low	Lowest of Other Methods					
SAIDI	81.28	85.44	88.30	86.32	85.44	98.35	69.89	88.30	74.21	96.46
SAIFI	0.83	0.94	0.91	0.94	0.91	0.91	0.78	1.15	0.73	1.14
CAIDI	97.75	90.75	89.61	91.96	89.61	108.36	89.61	76.87	101.87	84.39
		90.75	97.28	91.49	94.14	CAIDI using SAIDI / SAIFI formula				

SAIDI & SAIFI On Target for all target methods

CAIDI Off Target for all target methods

Metro West	2013 Actual	2013 Targets				2012 Actual	2011 Actual	2010 Actual	2009 Actual	2008 Actual
		Approved (5 Year Avg)	5 Yr Median	5 Yr Avg after removing Hi & Low	Lowest of Other Methods					
SAIDI	98.71	97.92	101.28	96.78	96.78	103.98	85.07	114.85	84.43	101.28
SAIFI	0.94	0.98	0.98	0.97	0.97	0.98	0.87	1.19	0.79	1.06
CAIDI	105.09	100.17	98.20	100.21	98.20	105.93	98.20	96.49	106.58	95.78
		100.17	103.19	99.93	99.93	CAIDI using SAIDI / SAIFI formula				

SAIDI Off Target for 5 Year Avg, Avg after removing Hi & Low, and Lowest value methods, On Target for Median

SAIFI On Target for all target methods

CAIDI Off Target for all target methods

Northwest	2013 Actual	2013 Targets				2012 Actual	2011 Actual	2010 Actual	2009 Actual	2008 Actual
		Approved (5 Year Avg)	5 Yr Median	5 Yr Avg after removing Hi & Low	Lowest of Other Methods					
SAIDI	95.90	102.56	103.27	97.79	97.79	106.07	103.27	84.02	62.07	157.38
SAIFI	0.93	0.87	0.84	0.82	0.82	0.84	0.85	0.77	0.65	1.24
CAIDI	102.86	117.94	122.13	118.82	117.94	125.62	122.13	108.70	96.21	126.93
		117.94	122.31	119.11	119.11	CAIDI using SAIDI / SAIFI formula				

SAIDI & CAIDI On Target for all target methods

SAIFI Off Target for all target methods

Southeast	2013 Actual	2013 Targets				2012 Actual	2011 Actual	2010 Actual	2009 Actual	2008 Actual
		Approved (5 Year Avg)	5 Yr Median	5 Yr Avg after removing Hi & Low	Lowest of Other Methods					
SAIDI	108.83	78.16	71.54	73.02	71.54	71.54	78.15	103.67	69.37	68.09
SAIFI	0.75	0.71	0.72	0.70	0.70	0.59	0.72	0.86	0.63	0.75
CAIDI	145.11	109.97	110.06	112.83	109.97	120.50	107.92	121.07	110.06	90.85
		109.97	98.80	104.12	102.01	CAIDI using SAIDI / SAIFI formula				

SAIDI, SAIFI, & CAIDI Off Target for all target methods

This Attachment addresses the requirements of the Commission's January 13, 2014 Order in Docket No. E002/M-13-255, specifically:

3. *Xcel shall augment its next annual filing to include a description of the policies, procedures, and actions that it has implemented, and plans to implement, to assure reliability, including information on how it is demonstrating proactive management of the system as a whole, increased reliability, and active contingency planning.*
4. *Xcel shall incorporate into its next annual filing a summary table that allows the reader to more easily assess the overall reliability of the system and identify the main factors that affect reliability.*

Overview

Each year, Xcel Energy develops and manages programs to maintain and improve the performance of its transmission and distribution assets. We identify and implement these programs in an effort to assure reliability, enable proactive management of the system as a whole, and effectively respond when outages occur.

In this document, we provide a snapshot of our 2013 reliability results. We additionally outline our process for developing and implementing programs to maintain and improve our system, detail key indicators of the highest impact programs, and graphically chart current year outages by cause codes. We also provide reliability cost matrices, which compare reliability-related Capital and Operating and Maintenance expenses to our reliability results.

In addition, at the last Commission hearing regarding our annual service quality report on December 12, 2013, Commissioners noted they would like to have a better understanding of the customer's experience. In an effort to respond to those comments, we have included three new tables to illustrate our reliability performance trending as well as a discussion around new CEMI (Customers Experiencing Multiple Interruptions) tools.

2013 Reliability Results

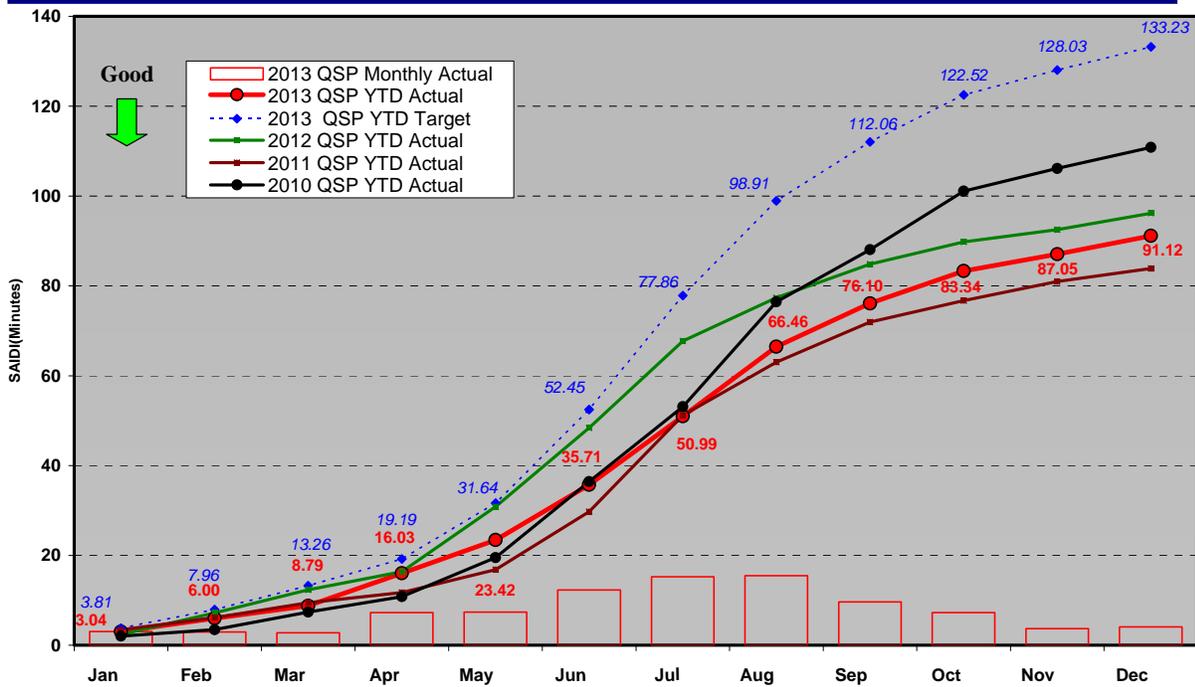
In 2013, we achieved a SAIDI result of 91.12 minutes, which exceeds our Quality of Service Plan tariff goal of 133.23 minutes.¹ Our 2013 SAIFI result of .86 outage events also exceeds the QSP tariff goal of 1.21 outage events.² The below graphs show overall system performance for the years 2010 through 2013, with storm days excluded, per the new QSP tariff calculation method.

¹ Minnesota Electric Rate Book MPUC. No. 2 Section 6, Sheets 7.1 through 7.11, approved by the Commission's August 12, 2013 Order in Docket Nos E,G002/CI-02-2034 and E,G002/M-12-383

² In this context, "exceeding" the goals is a positive result, reflecting good system performance.



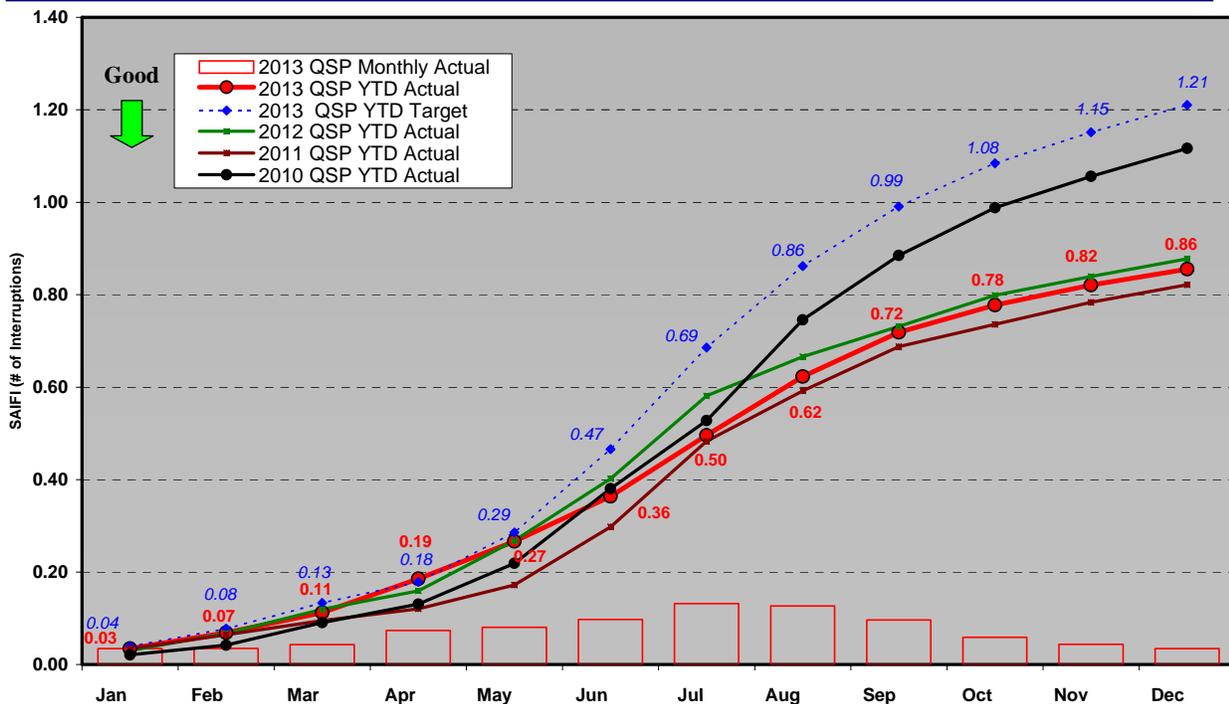
MINNESOTA QSP SAIDI - YTD (Tariff Method/Threshold)
 (Excluding Transmission Line level, Including All Causes)



IEEE Normalized by Region after excluding Transmission Line level
 Based on sustained outages only (>5 minutes), excluding Transmission Line level, including all Causes, Meter-based customer counts



MINNESOTA QSP SAIFI - YTD (Tariff Method/Threshold)
 (Excluding Transmission Line level, Including All Causes)



IEEE Normalized by Region after excluding Transmission Line level
 Based on sustained outages only (>5 minutes), excluding Transmission Line level, including all Causes, Meter-based customer counts

We have previously provided a chart of QSP Tariff historical storm day exclusions, however, this year in an effort to provide the Commission a better idea of our reliability performance trending, we are now providing three tables showing the historical performance, storm days and the current targets under three methodologies (including storms, our QSP Tariff, and the Minnesota Rules). These three tables are below.

Historical Reliability Indices & Storm Day Exclusions

With Storms¹		2009	2010	2011	2012	2013
Minnesota	SAIDI	79.66	274.42	207.77	149.15	562.11
	SAIFI	0.76	1.50	1.11	1.07	1.39
	CAIDI	104.58	183.43	187.11	139.51	404.36
Metro East	SAIDI	76.66	270.43	113.90	190.95	352.30
	SAIFI	0.76	1.59	0.96	1.20	1.27
	CAIDI	101.50	170.23	118.95	159.23	278.46
Metro West	SAIDI	86.77	301.09	238.03	139.19	810.01
	SAIFI	0.81	1.54	1.19	1.10	1.55
	CAIDI	106.87	196.10	199.66	126.85	523.66
Northwest⁴	SAIDI	62.08	181.38	470.05	109.75	468.22
	SAIFI	0.65	1.26	1.40	0.87	1.40
	CAIDI	96.21	143.66	334.78	126.17	335.53
Southeast⁵	SAIDI	73.10	251.24	125.28	97.25	179.29
	SAIFI	0.66	1.24	0.95	0.71	1.06
	CAIDI	110.52	203.04	131.69	137.84	168.93

MN Tariff²		2009	2010	2011	2012	2013	'13 Target
Minnesota	SAIDI	74.48	110.83	83.87	96.20	91.12	133.23
	SAIFI	0.71	1.12	0.82	0.88	0.86	1.21
	CAIDI	104.90	99.24	102.08	109.60	106.51	NA
Metro East	SAIDI	69.43	102.03	79.34	90.70	83.56	
	SAIFI	0.70	1.20	0.83	0.88	0.83	
	CAIDI	98.60	85.09	96.00	103.35	100.72	
	MED	0	4	2	5	3	
	Days	None	6/25,7/17, 10/26,11/13	7/1,7/10	6/10,6/19,7/3, 8/3,11/10	6/21,6/22, 6/23	
Metro West	SAIDI	85.69	123.25	88.20	103.42	101.24	
	SAIFI	0.80	1.22	0.87	0.97	0.96	
	CAIDI	107.03	101.10	101.09	106.83	105.85	
	MED	0	4	5	3	5	
	Days	None	6/25,7/17, 10/26,11/13	5/22,7/1,7/10, 7/18,8/1	2/29,6/19,8/3	6/21,6/22, 6/23,6/24,8/6	
Northwest⁴	SAIDI	52.61	102.79	79.42	94.20	85.78	
	SAIFI	0.45	0.80	0.69	0.73	0.75	
	CAIDI	116.70	129.28	115.38	128.31	113.87	
	MED	0	2	6	0	2	
	Days	None	8/13,10/26	2/20,5/30,7/1,7 /10,8/1,8/2	None	6/21,6/22	
Southeast⁵	SAIDI	59.71	89.58	82.70	82.40	73.58	
	SAIFI	0.56	0.69	0.70	0.59	0.57	
	CAIDI	107.39	130.66	118.72	138.48	129.93	
	MED	0	5	2	1	4	
	Days	None	6/25,6/26,7/24, 8/13,11/13	7/1,7/23	8/4	4/9,5/2,5/26, 6/21	

Distribution System Performance Summary
PUBLIC DOCUMENT
TRADE SECRET DATA EXCISED

Annual Rules ³		2009	2010	2011	2012	2013	'13 Target
Minnesota	SAIDI	77.36	101.99	81.10	99.00	93.73	NA
	SAIFI	0.74	1.10	0.82	0.90	0.88	NA
	CAIDI	104.49	92.54	98.75	109.47	106.06	NA
Metro East	SAIDI	74.21	88.30	69.89	98.35	81.28	85.44
	SAIFI	0.73	1.15	0.78	0.91	0.83	0.94
	CAIDI	101.87	76.87	89.61	108.36	97.75	90.75
	Storm Days	1 5/20	7 6/25,7/17,8/10, 9/21,10/26, 10/27,11/13	5 7/1,7/10,7/18, 8/1,8/2	5 2/29,6/10, 6/19,7/3,8/3	5 4/23,6/21, 6/22,6/23,6/24	
Metro West	SAIDI	84.43	114.85	85.07	103.98	98.71	97.92
	SAIFI	0.79	1.19	0.87	0.98	0.94	0.98
	CAIDI	106.58	96.49	98.20	105.93	105.09	100.17
	Storm Days	1 5/20	5 6/25,7/17,10/26 10/27,11/13	7 5/22,6/21,7/1, 7/10,7/18,8/1, 9/29	3 2/29,6/19,8/3	7 6/21,6/22, 6/23,6/24, 6/25,6/26,8/6	
Northwest ⁴	SAIDI	62.07	84.02	103.27	106.07	95.90	102.56
	SAIFI	0.65	0.77	0.85	0.84	0.93	0.87
	CAIDI	96.21	108.70	122.13	125.62	102.86	117.94
	Storm Days	0 None	8 5/22,6/11,7/17, 8/12,8/13,10/26 ,10/27,11/13	8 5/30,6/21,7/1, 7/5,7/10,7/15, 8/1,8/2	1 6/19	3 6/21,6/22,6/23	
Southeast ⁵	SAIDI	69.37	103.67	78.15	71.54	108.83	78.16
	SAIFI	0.63	0.86	0.72	0.59	0.75	0.71
	CAIDI	110.06	121.07	107.92	120.50	145.11	109.97
	Storm Days	1 5/20	10 6/11,6/17,6/25, 6/26,6/27,7/24, 8/10,8/13,10/26 ,11/13	7 6/14,7/1,7/11, 7/15,7/18,7/23, 7/27	5 6/14,6/19,6/2 0 8/4,9/5	4 5/2,6/21,7/13, 10/3	

- 1) With Storms - Includes All Days, Levels and Causes, Meter-based customer counts
- 2) MN Tariff - Normalized using IEEE 1366 after removing Transmission Line level, All Causes, Meter-based customer counts
- 3) Annual Rules - Normalized using 3 sigma of rolling 5 year count of sustained outages, All Levels, All Causes Meter-based customer counts
- 4) Northwest - Includes customers counts and outages in the North Dakota work region that impact Minnesota customers
- 5) Southeast - Includes customers counts and outages in the South Dakota work region that impact Minnesota customers

Reliability Management Program (RMP) Development

Our annual reliability planning process begins with an analysis of the causes for historical outages. We use pareto charts in our analysis, as provided below, which show outage cause codes for a multi-year time period, ranked in descending order by the number of Sustained Customer Interruptions (SCI).³

Pareto Analysis. The following pareto charts show feeder, tap, substation and transmission level customer interruptions by primary cause code for the years 2009 through 2013. The “balloons” highlight areas our plans are currently focusing on.

Previously when we provided these pareto charts they were based on NSPM (which includes Minnesota, North Dakota and South Dakota) and used our corporate storm

³ Electric service interruptions greater than five minutes in length.

normalization days. We have updated these charts this year to be based on Minnesota only using our new QSP Tariff methodology.

We note that programs typically require multiple years before their full impact is realized. At first, the programs may only halt SCI increases, but continuing investment eventually reverses adverse trends.

Our current RMP investments are maintaining appropriate levels of overhead (OH) and underground (UG) system performance. Programs such as our Feeder Performance Improvement Program (FPIP) and Reliability Exception Monitoring System (REMS) have realized significant contributions in system performance, and are helping to eliminate or mitigate the failures that would be otherwise typical of aging equipment.

We recognize that it is critical to combine our RMP process with a longer-term view of the aging distribution system in order to provide our customers with reliable electric service, and are taking actions to that end.

[TRADE SECRET BEGINS

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1. *Reliability Management Programs – ‘Star Chart’*

After considering the most common failures and their causes, as well as at-risk equipment, we develop work plans, or programs, to target our investments; we provide these programs in the ‘Star Chart’ on the following page. These programs represent those proactive investments in our transmission and distribution systems that we believe are most likely to improve overall reliability, asset health, and meet various contingency planning requirements. These investments are made in addition to other capital investments that provide for adequate capacity to meet customer requirements and to accommodate load switching during outage response to minimize customer impacts.

[TRADE SECRET BEGINS

Reliability Management Program Impacts (Star Chart)

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We have indicated the primary performance impacts of these programs with a red star, where applicable; possible performance impacts include SAIFI (System Average Interruption Frequency Index), CAIDI (Customer Average Interruption Duration Index), CEMI (Customers Experiencing Multiple Interruptions), CELI (Customers Experiencing Lengthy Interruptions) and Customer Complaints.

These programs become part of the annual RMP. A Reliability Core Team (RCT), consisting of both Field and Planning functions monitors system performance and progress against the RMP on a monthly basis, taking actions as necessary to ensure the best possible system performance.

2. *Reliability Management Programs – Key Initiatives*

The below chart outlines primary program indicators for our key initiatives/programs. The actual amount of work completed under each program varies from year to year, and is based primarily on assessments of those areas requiring the greatest attention, as well as the results of our condition assessment (*i.e.*, the number of deficiencies requiring corrective action). For further description of the programs described in the Key Initiatives Chart, please see the Star Chart.

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3. *Reliability Management Programs – Work Practices*

Improvements to existing work practices that the RCT members and their staffs identify and implement are also an important contributor to the customer reliability experience and our reliability performance. These are operational and/or procedural changes intended to either reduce the *duration* of outages should they occur—CAIDI, or to reduce the *frequency* of outages—SAIFI.

As noted in the Reliability Management Work Practices Chart below, we assess and prioritize the actions based on a balance of their ability to positively impact reliability (high, medium or low), as well our ability to incorporate into standard work practices – with most occurring concurrently. Many of these actions do not require additional funding to implement, and are achieved via ongoing employee training and/or incorporation into standard work procedures. We continuously monitor all actions, and update our plan as appropriate.

[TRADE SECRET BEGINS

Reliability Management Work Practices Chart

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Reliability Management Work Practices Chart (cont)

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Reliability Management Work Practices Chart (cont)

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Reliability Cost Matrices

Isolating the costs associated with providing customers reliable electric service is a challenge, which stems primarily from the interrelatedness of the work that our construction, maintenance, engineering, and other field operations areas perform. These functions are involved in repairing the system when it fails, performing maintenance on the system, and making capacity additions or other upgrades for our customers – all activities that contribute to providing our customers with reliable service.

For example, when we increase the capacity of a portion of our system for new customers, those improvements may also bring reliability improvements to current customers by providing them additional redundancy to the facilities currently serving them.

Given the inherent challenge of capturing the relevant costs of providing reliable service to our customers, we have identified two cost categories that we believe represent significant contributors to our reliability performance:

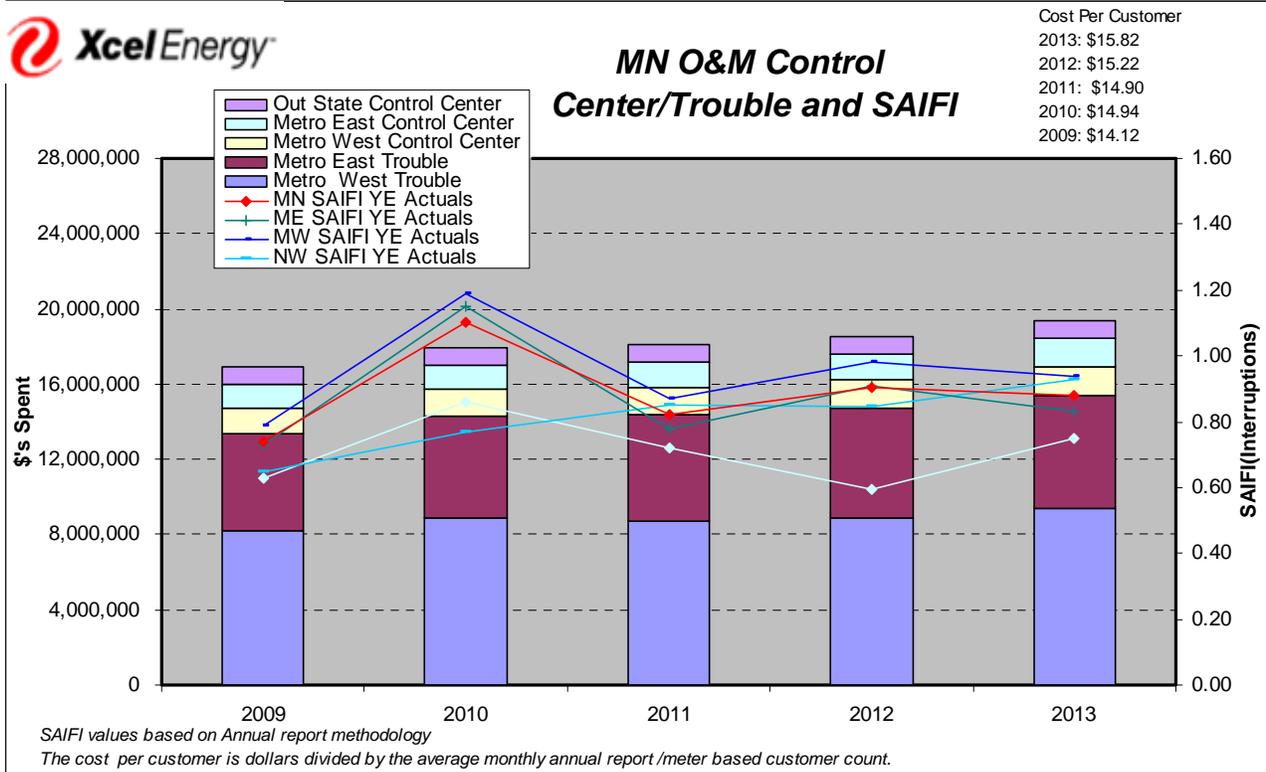
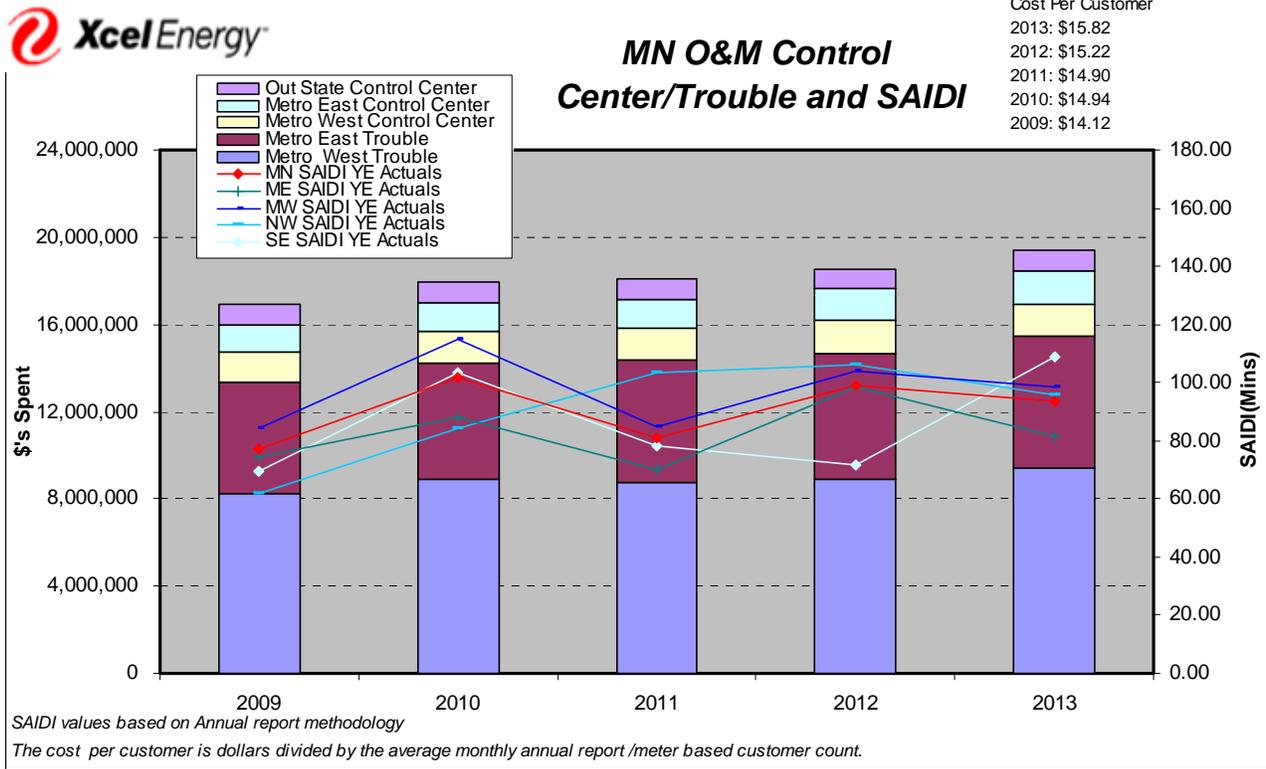
- 1) Distribution Control Center and Trouble Operations O&M costs; and,
- 2) Distribution Capital Reliability Expenditures.

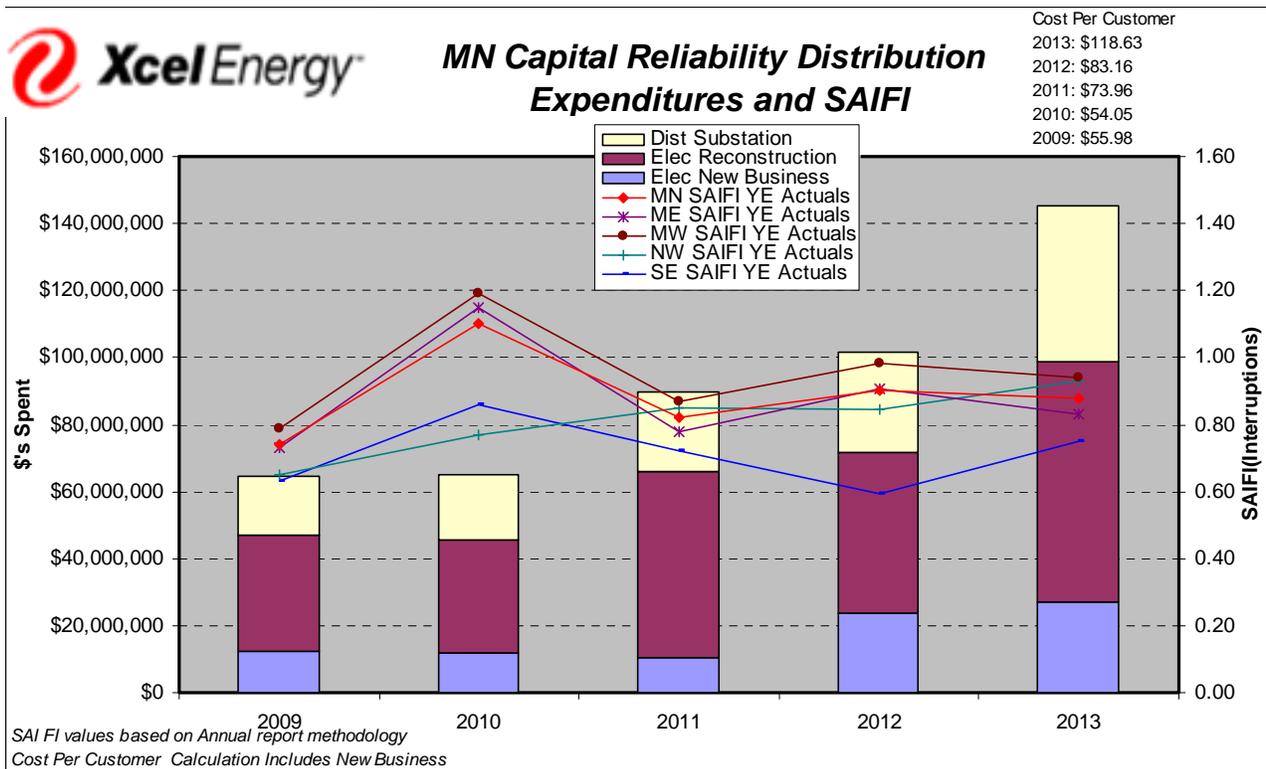
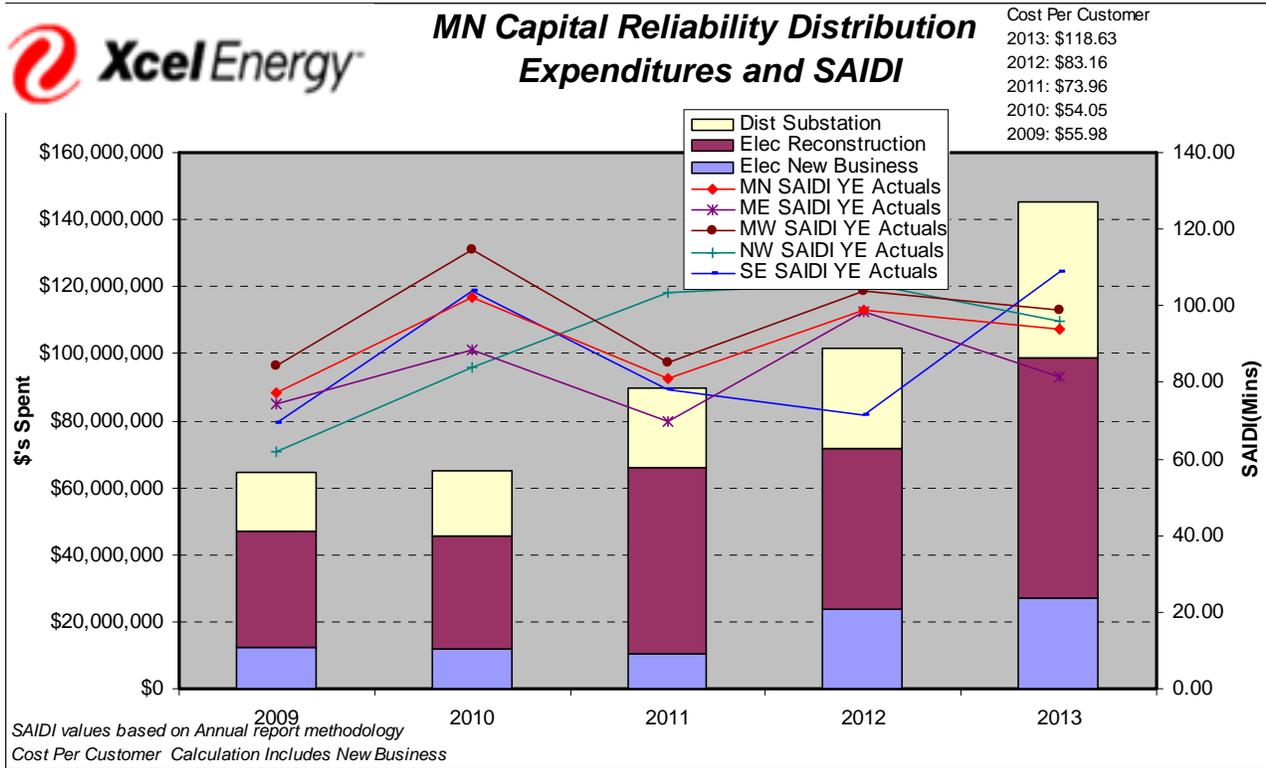
We provide below, graphs demonstrating these costs compared to both SAIDI and SAIFI for 2009-2013.

We note that we calculated the below Minnesota O&M Control Center/Trouble costs using the actual expenses (labor, fleet, materials, and other) of the five business areas whose primary responsibility is outage restoration and emergency response. We note that this includes dispatchers from North Dakota and South Dakota

Additionally, we provide graphs demonstrating our SAIDI and SAIFI performance compared to our Capital Reliability Expenditures.

We note that the following capital expenditures include any dollars spent that *may* have an impact on reliability. For example, this would include capacity funding and capital projects, such as cable replacement and our FPIP. On the following graphs, “new business” indicates areas where we are not established and needed to install either overhead or underground lines and “reconstruction” is any rebuilding or construction that is related to existing customers.





CEMI Tools

At the last Commission hearing regarding our annual service quality report on December 12, 2013, Commissioners noted they would like to have a better understanding of the customer's experience. In an effort to respond to that comment, we have included some new maps and a discussion below.

We recently developed new tools that allow us to better track the causes of our CEMI (Customers Experiencing Multiple Interruptions). In conjunction with a mapping tool we can look at our customer's experience as it identifies customers with multiple outages over a revolving 12 months and then provide a visual representation of those outages in our service territory. Although, the metric measures customers who have experienced at least six sustained outages during non-storm days, we can start studying customers experience earlier. This customer centric tool helps highlight customers that have had outages from different causes rather than a single root cause. In other words, this tool does not look at the device that caused the outage, it examines how many times a customer was out of service regardless of the reason.

We developed these tools over the past several years in an effort to expand our existing reliability planning and tools. While we have existing programs, such as the Reliability Management System (REMs) that help us identify specific equipment issues (for instance, the same device tripping multiple times) we did not have the capability to link the outage information with the specific customer information on a holistic basis. Since much of our analysis has focused on a system perspective, this new tool really rounds out our reliability planning by helping focus on the customers' experience.

There are many reasons a customer could have an outage. These causes include downed trees, animal contact, a car hitting a pole or even a lightning strike. Each one of these causes could show up on a different report for a different piece of equipment that all serve the same customer. With existing tools and information, we looked for single protective devices that experienced multiple events and used that as a proxy to improve our customers' experience. However, new technologies now allow us to analyze customer experience *truly* from a customers' experience. These new tools should help our efforts to reduce repeated outages for customers.

Though we are still finalizing the details and uses of these new tools, we currently envision that these tools will be used by engineering and operations to optimize the performance of our system by allowing more in depth analysis on the customers that experience more outages than others.

Using these new tools, we created the attached maps of our service territory. The first map, **Attachment M1**, is an overall view of our entire Minnesota service territory and the second view, **Attachment M2**, is a zoomed in version of that same map for the Twin Cities metro area. Both of these maps are interactive and the views can be zoomed in and out to make the data more meaningful. Green dots represent those feeders that did not have any customers experiencing more than five outages in 2013.

Additional notes about the Maps:

- Data is based on the CEMI under performance measure requirement of customers experiencing greater than 5 outages in a single year
- Bubbles are color coded based on the number of customers in that area that experienced greater than 5 outages.
- The geographic location of the bubble is not a precise location of an individual problem but rather generally indicates the area affected.

Conclusion

In summary, this document outlines the Company's reliability results, provides trend information, and correlates both the impact of outside forces, as well as the positive actions we have taken to achieve our results. We have summarized the processes and data that we use to determine areas of greatest impact, develop targeted investment strategies, ensure the execution of annual work plans, and assure reliability and ongoing satisfactory performance of the system as a whole. We know that positive results are a direct reflection of consistent and sustained focus, and as such, believe our RMP and other actions provide a solid foundation on which to deliver reliable performance of our distribution system.

Legend

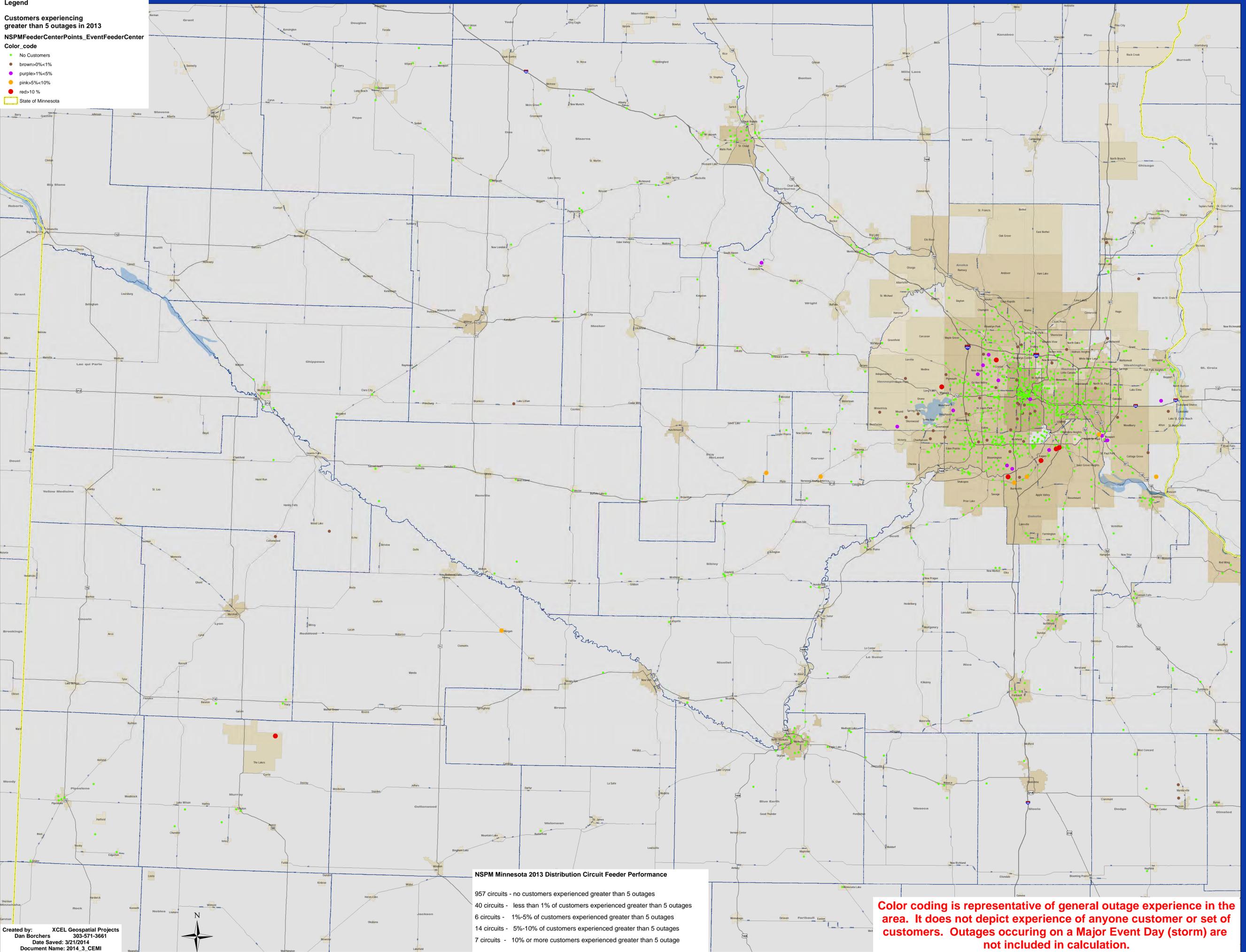
Customers experiencing greater than 5 outages in 2013

NSPMFeederCenterPoints_EventFeederCenter

Color_code

- No Customers
- brown>0%<1%
- purple>1%<5%
- pink>5%<10%
- red>10%

State of Minnesota



NSPM Minnesota 2013 Distribution Circuit Feeder Performance

957 circuits - no customers experienced greater than 5 outages
 40 circuits - less than 1% of customers experienced greater than 5 outages
 6 circuits - 1%-5% of customers experienced greater than 5 outages
 14 circuits - 5%-10% of customers experienced greater than 5 outages
 7 circuits - 10% or more customers experienced greater than 5 outage

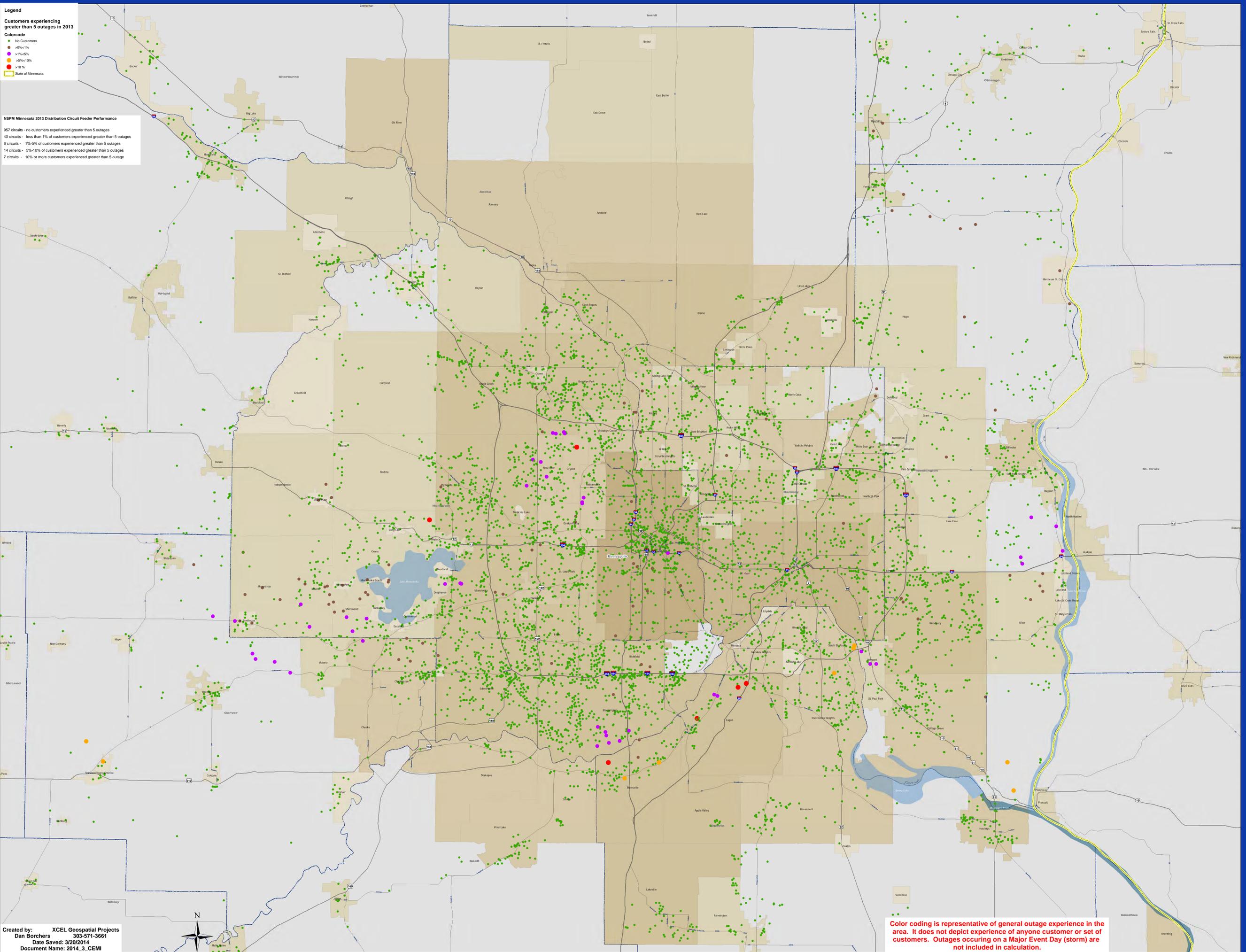
Color coding is representative of general outage experience in the area. It does not depict experience of anyone customer or set of customers. Outages occurring on a Major Event Day (storm) are not included in calculation.

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 Dan Borchers 303-571-3661
 Date Saved: 3/21/2014
 Document Name: 2014_3_CEMI



Legend
Customers experiencing greater than 5 outages in 2013
Colorcode
 ● No Customers
 ● >0%<1%
 ● >1%<5%
 ● >5%<10%
 ● >10%
 ■ State of Minnesota

NSPM Minnesota 2013 Distribution Circuit Feeder Performance
 957 circuits - no customers experienced greater than 5 outages
 40 circuits - less than 1% of customers experienced greater than 5 outages
 6 circuits - 1%-5% of customers experienced greater than 5 outages
 14 circuits - 5%-10% of customers experienced greater than 5 outages
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Color coding is representative of general outage experience in the area. It does not depict experience of anyone customer or set of customers. Outages occurring on a Major Event Day (storm) are not included in calculation.

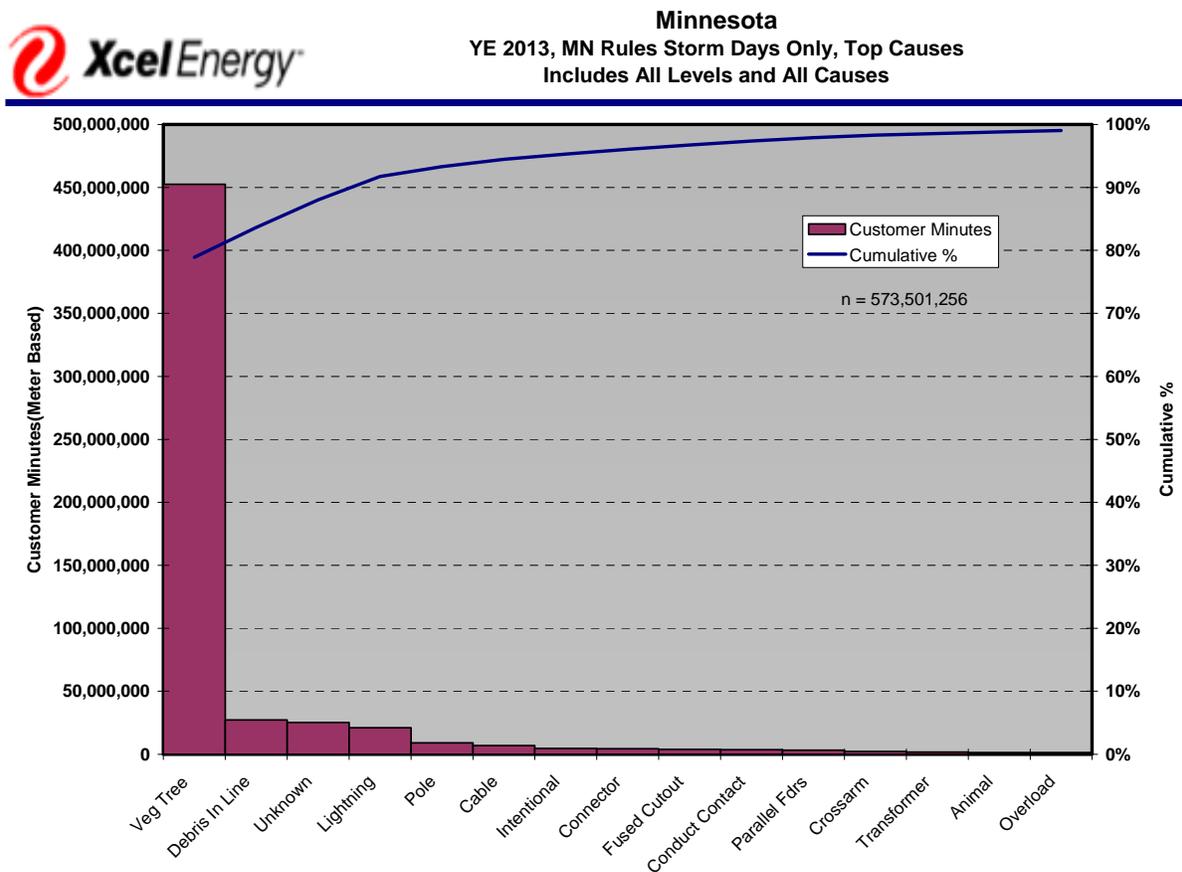
In this Attachment, we provide the following reliability-related information:

- Storm Day outage causes;
- “Near miss” storm days; and,
- Momentary Average Interruption Frequency Index (MAIFI) results.

In addition, in compliance with the Commission’s Order issued September 3, 2013 in Docket No. E002/GR-12-961 and the commitment we made in our September 19, 2013 Final Rates Compliance filing in that docket, we provide additional reporting of currently available MAIFI data as well as a discussion of the options available to provide a full-MAIFI.

I. Storm Day Outage Causes

The below graph shows the major causes of outages for storm days using our Annual Rules storm normalization methodology.



II. “Near-Miss” Storm Days

Following are the “near-miss” storm days by work center, using our Annual Rules storm normalization methodology. These days came within 10-30 percent of the storm threshold, thus, they came *close* to being designated as storm days:

Annual Rules Normalization - Near Miss Days

Region	Date	SAIDI on Days within 10% of Storm Threshold	SAIDI on Days within 10-20% of Storm Threshold	SAIDI on Days within 20-30% of Storm Threshold
Metro East	5/2/2013			1.2
Metro East	6/26/2013			1.5
Metro East	7/9/2013		2.0	
Metro East	8/6/2013			3.4
Region Total Impact		0.0	2.0	6.2
Metro West	7/13/2013		5.3	
Region Total Impact		0.0	5.3	0.0
Northwest	6/24/2013	0.1		
Region Total Impact		0.1	0.0	0.0
Southeast	5/3/2013		0.4	
Southeast	6/22/2013		2.8	
Southeast	7/9/2013	0.6		
Region Total Impact		0.6	3.2	0.0
MN Total Impact		0.1	3.5	2.0

* SAIDI impacts based on individual regional impacts.

* MN Total based on overall state impacts. Not the additive of individual regional impacts.

III. MAIFI Results

The following 2013 MAIFI reporting provides the MAIFI calculation for our SCADA-enabled Feeder-level protection devices that have operated within a five minute time period, using the IEEE Momentary Interruption Event definition.

Generally, momentary outage information is available at the Feeder-level and above, by Feeder circuit, and only on Feeders that are located in substations with Supervisory Control and Data Acquisition (SCADA) capability. With current distribution

infrastructure, we are able to report MAIFI at the distribution Feeder level for approximately 92 percent of our retail customers.

Below are our 2013 MAIFI results followed by definitions of the calculation methodologies we applied:

2013 MAIFI Results

Region	Non-Normalized	Xcel Energy QSP Tariff	Xcel Energy Annual Rules
Minnesota	1.00	0.66	0.83
Metro East	0.97	0.77	0.80
Metro West	0.87	0.65	0.77
Northwest	1.82	0.67	1.28
Southeast	0.89	0.35	0.78

Non-normalized

- Includes outages occurring at all levels (distribution, substation, and transmission).
- Includes all outage cause codes.
- Calculations are based on the number of customers' billing accounts and meters.
- Include all days in calculations.

Xcel Energy (Quality of Service Plan Tariff Method)

- Excludes outages occurring at Transmission Line level.
- Includes all outage cause codes.
- Calculations are based on the number of customers' billing accounts and meters.
- Excludes all storm days that qualify under IEEE 2.5 normalization method after removing Transmission Line level.

Xcel Energy (Annual Rules Method)

- Includes outages occurring at all levels (distribution, substation, and transmission).
- Includes all outage cause codes.
- Calculations are based on the number of customers' billing accounts and meters.
- Excludes all storm days that qualify under Annual normalization method.

In addition, in compliance with the Commission's Order issued September 3, 2013 in Docket No. E002/GR-12-961 and the template we provided in our September 19, 2013 Final Rates Compliance filing in that docket, we have included the following five additional MAIFI reports as **Attachment N1**:

1. A table with annual MAIFI results for Minnesota and our four work centers using three different normalization methodologies;
2. A table with the MAIFI results and Customer Interruptions by month and by work center;
3. A five-year historical look for Minnesota MAIFI that shows the three different normalization methodologies and their associated trend lines;
4. A pareto chart showing the top causes for interruptions for the current year; and
5. A pareto chart showing the top causes for interruptions for the past five years.

Our system capabilities and procedures have changed and evolved over time. Therefore, the historical MAIFI results will be based on what our protocol and physical capabilities were for capturing momentary events at that point in time.

IV. MAIFI Report

Below is a discussion of the options available to implement a full-MAIFI.

A. Background

MAIFI is a measure of momentary outages that was originally developed to measure transmission system performance. IEEE 1366 defines momentary outages as the single operation of an interrupting device resulting in a zero voltage. In other words, MAIFI tracks when a protective device opens and closes in a momentary fashion and the event does not result in a sustained outage. This will happen in a few seconds, normally less than fifteen seconds. In utility terms, any outage less than five minutes is termed as momentary. Since many of the distribution substations and the entire transmission system are monitored closely via the SCADA system, SCADA became a reasonable way to track this.

Momentary interruptions are generally caused by temporary faults caused by tree contact, lighting or animals. When these faults occur, protective devices detect the

fault, interrupt the power supply and restore the power. If the fault is cleared, the power is restored. If the fault remains, the protective device will attempt to repeat the clearing process up to three times before the device remains open and the outage becomes sustained. These protective devices help prevent longer, sustained outages that would otherwise arise from the temporary faults.

On a related note, SAIDI (System Average Interruption Duration Index) and SAIFI (System Average Interruption Frequency Index) which are more widely used indices in the industry measure the average duration and frequency, respectively, of supply interruptions per customer per year. Only sustained interruptions are counted in SAIDI and SAIFI, so momentary outages are not accounted for in those measurements. Thus, there is a trade off between SAIDI/SAIFI and MAIFI—a choice between reducing the duration or frequency of sustained interruptions and reducing the momentary outages. For instance, one way to improve a MAIFI would be to reduce the number of temporary faults; however, that would mean those temporary faults would then immediately become sustained faults—and SAIDI and SAIFI would increase (and outage duration and frequency in general) which most customers would prefer to avoid.

B. Current Practice – Tracking MAIFI at the Feeder Level

We currently report the MAIFI calculation for our SCADA-enabled feeder level protection devices that have operated within a five minute time period. Given our current distribution infrastructure, in Minnesota we are able to report MAIFI at the distribution feeder level for approximately 92 percent of our retail customers. While we have knowledge of when feeder breakers trip and reclose (and create a momentary outage event) via SCADA, we do not have knowledge of other devices such as field reclosers (a self-contained distribution protective device that can interrupt a short circuit and automatically reclose) operating.

We cannot provide a more fully developed measurement for MAIFI at this time for two reasons. First, not all of the Company's substations in Minnesota are equipped with SCADA equipment. SCADA notes outage events and transmits the information to a central location for data collection. Second, SCADA only captures outage information at the feeder mainline level and above. This means that SCADA does not capture outages that occur on the distribution system between the customer and mid-feeder protective devices. For example, a momentary outage event can occur between the customer and substation when a field recloser operates, the resulting momentary outage is not captured by SCADA at the substation. While some of our

non-monitored field devices have counters to note the number of outage events that have occurred since the device was last checked, there is no communications link from the device to a central location to automatically collect that data. Further, even if we were to manually collect the data, we would only be able to see the number of events on the counter, we would not be able to actually determine which outages were momentary and which outages were sustained.

C. Tracking MAIFI at the Customer Level

In recent years, outside parties have indicated a desire for utilities to track momentary outages at the customer level. Like us, other Minnesota utilities (including Otter Tail Power) are currently tracking MAIFI on a feeder level basis.

As discussed further below, to implement a customer-level MAIFI would require substantial system changes. However, there are two conceivable ways we could implement a customer-level MAIFI on our system: (1) expand our current SCADA system, or (2) install a new metering system. They are both discussed below.

1. Expand Existing SCADA System

The first option for tracking MAIFI on a customer-level basis would be to expand our existing SCADA system to monitor the interrupting devices that can trip and reclose, since not all of our existing equipment has monitoring equipment today.

There are two reasons why a customer would not have momentary outages captured. The first reason is that we have some feeders that do not have a SCADA indication that the breaker has operated. The second reason concerns customers who are located downstream from a feeder recloser. Since we do not have indication of feeder reclosers, we would not have a momentary outage captured for any customer downstream of a recloser. This applies to feeders with and without SCADA.

To achieve visibility into momentary outages due to substation breaker operations requires SCADA or remote monitoring. SCADA is the standard technology and provides many benefits in addition to reporting momentary operations. While SCADA is present at 60% of our Minnesota substations, those substations serve approximately 92% of our Minnesota customers. To implement SCADA at the remaining 88 substations will cost approximately \$22 million. The company is adding SCADA to our substations at a rate of several substations per year. An alternative means could be to install remote monitoring on the distribution feeders for approximately \$400,000, plus communication costs. However, we note that remote

monitoring devices available have a relatively short lifespan – perhaps 10 years – whereas SCADA installations are much more robust.

Additionally, we would need to monitor field reclosers. We have approximately 1,140 reclosers in Minnesota, most of which would need to be replaced with newer models with electronic controls at a cost of approximately \$20 million. An alternative means (but with fewer benefits) could be to install remote monitoring on the circuits downstream of the reclosers for approximately \$3.5 million, plus communication costs. We are currently evaluating potential communications infrastructure option, and if implemented, the annual communication costs might be reduced.

2. *Advanced Metering Infrastructure*

The second opportunity to track MAIFI at the customer level would be to monitor the momentary interruptions at the customer premise level. This could be included in a corporate strategic approach to advanced metering infrastructure (AMI).

This would require us to install a new metering system that captures real time momentary outages. In addition to the new metering system, we would also need to install a new communication system that would allow us to receive, process, and manage that large amount of data. In other words, implementing MAIFI in this manner would require a significant investment in new metering and communication infrastructure on the Company's system. A discussion of our automated meter reading statistics and strategy is included in our Smart Grid section of this report (Attachment K).

While we are not considering this type of upgrade at this time, we determined that at a very high level the estimated price to replace the meters in Minnesota alone to enable this type of capability would be more than \$131 million. This does not include any of the costs associated with the information system changes that would be required to actually use and process this data – like upgraded network facilities, a new database management system, and upgrades to allow interfaces with other systems.

D. Key Issues

While we recognize that some stakeholders prefer a reliability metric that more closely resembles the customer's experience, we do not believe either alternative for implementing MAIFI is feasible at the current costs.

In addition to the high price tags for these two options, there are other drawbacks as well. First, if the goal is to ultimately reflect the customer's experience and potentially address power quality concerns with this metric, neither of these options would completely achieve those goals. The IEEE definition of MAIFI indicates a protective device has to operate for an event to count as a momentary outage. However, other events can lead to customers believing they had a momentary outage but a protective device never operated, so the event would not count toward the MAIFI metric. For instance, faults on either the transmission or distribution system can cause voltage dips that cause visible flicker or even trip equipment or lighting off-line. So, even after implementing all those investments under either alternative, this index would still not capture the customer's total experience.

In addition, we do not use the MAIFI metric in our overall planning because knowledge of momentary outages provides little benefit when analyzing the overall health of a distribution system as so few devices on the distribution system fail and heal themselves. Once a distribution device has failed to the point that a protective device operates, a repair person must be sent to the site. Most momentary outages on the distribution system are due to tree contact and lightning. However, due to our vegetation management practices, there are few preventable tree contacts. Thus, our current untracked momentary outages are mostly due to lightning, an uncontrollable and unpreventable cause. In the rare instances that a recloser or feeder breaker fails on the distribution system in a manner that results in many momentary outages, we rely on customer calls to notify us of these events.

Transmission outages do not generally directly result in customer outages, due to the redundancy of the overall transmission system in our metro areas. In rural areas most customers will experience a momentary outage for a transmission event. However, transmission outages may cause power quality impacts in any area. Since a momentary outage event requires the voltage to go to zero, not just a brief drop to a low voltage value, most disturbances that would upset the equipment of a customer (and cause the customer to believe they had an outage) are not included in a MAIFI metric, on a customer level or a feeder level.

Finally, as mentioned previously it is generally believed that customers would prefer a momentary interruption over a sustained outage so that is where we focus the majority of our reduction efforts and reliability planning. Put another way, we expect that the majority of our customers would find little value in a reliability metric such as MAIFI that measures an area where they do not seek improvement. Customers get a better understanding of reliability performance and the electric system that serves

them through SAIDI and SAIFI since these are generally the areas where the majority of customers seek improvement. For those specific customers who value improvements in momentary interruptions, we generally seek out alternative solutions for them and we work with them on an individual basis as discussed below.

E. Addressing Power Quality Concerns

Since power quality issues are one aspect that it seems parties are trying to address through implementing a customer-level MAIFI, we note that we work one-on-one with customers expressing power quality concerns such as those customers that experience a drop in voltage. Our first step in resolving these concerns is to conduct a voltage investigation, which we track and report to the MPUC annually. Often this investigation determines that the problem the customer is experiencing is with their internal wiring or the sensitivity of various customer-owned equipment or appliances, and not with the Company's distribution system. We do not track our work with these customers beyond our voltage investigation, but our Area Engineers and other Company representatives often work cooperatively with customers to identify and support customer installation of protective and/or other equipment that will ensure the customers' sensitive equipment is not disturbed by normal, minor fluctuations in distribution system power levels. We additionally note that we offer an annual Power Quality workshop to our large, managed account customers.

F. Conclusion

We believe our existing systems, reliability metrics and methods for handling customer concerns are working well right now. While we appreciate the increasing interest in MAIFI, we cannot provide a comprehensive and accurate reporting measure without considerable investment in monitoring equipment or meters. We continue to review our operations, equipment, and ability to leverage technology, and will expand our SCADA, metering, and other capabilities as they become cost effective and provide corresponding value to our customers. However, at this time we do not have any plans to further capture MAIFI on our system as the costs do not outweigh the limited benefits.

With Storms - All Levels, All Causes

MAIFI(<=5Mins)	2009	2010	2011	2012	2013
Metro East	0.75	1.18	0.80	0.95	0.97
Metro West	0.93	1.10	0.89	1.01	0.87
Northwest	1.12	1.38	1.59	1.42	1.82
Southeast	0.97	1.29	1.09	1.08	0.89
Minnesota	0.89	1.17	0.95	1.04	1.00

New Tariff - No Transmission Line, All Causes

MAIFI(<=5Mins)	2009	2010	2011	2012	2013
Metro East	0.70	0.89	0.59	0.81	0.77
Metro West	0.77	0.72	0.52	0.76	0.65
Northwest	0.59	0.61	0.38	0.96	0.67
Southeast	0.22	0.32	0.22	0.37	0.35
Minnesota	0.67	0.72	0.50	0.76	0.66

Annual Rules - All Levels, All Causes

MAIFI(<=5Mins)	2009	2010	2011	2012	2013
Metro East	0.70	0.97	0.69	0.85	0.80
Metro West	0.91	0.92	0.72	0.96	0.77
Northwest	1.12	1.07	0.65	1.42	1.28
Southeast	0.94	0.95	0.87	0.95	0.78
Minnesota	0.86	0.95	0.72	0.97	0.83

MAIFI - <= 5 Minutes Duration

Minnesota - MAIFI	January	February	March	April	May	June	July	August	September	October	November	December	YTD
2013 With Storms, All Levels, All Causes	0.03	0.04	0.05	0.10	0.09	0.25	0.10	0.11	0.05	0.06	0.03	0.07	1.00
New Tariff Normalized, No Trans Line, All Causes	0.03	0.03	0.05	0.09	0.07	0.09	0.10	0.07	0.05	0.05	0.02	0.02	0.66
Annual Normalized, All Levels, All Causes	0.03	0.04	0.05	0.10	0.09	0.11	0.10	0.10	0.05	0.05	0.03	0.07	0.83
2012 With Storms, All Levels, All Causes	0.02	0.03	0.08	0.08	0.15	0.19	0.13	0.14	0.08	0.05	0.03	0.04	1.04
New Tariff Normalized, No Trans Line, All Causes	0.02	0.03	0.06	0.07	0.13	0.11	0.09	0.08	0.08	0.05	0.02	0.03	0.76
Annual Normalized, All Levels, All Causes	0.02	0.02	0.08	0.08	0.15	0.15	0.12	0.13	0.08	0.05	0.03	0.04	0.97
2011 With Storms, All Levels, All Causes	0.02	0.03	0.04	0.06	0.09	0.09	0.26	0.18	0.06	0.04	0.03	0.04	0.95
New Tariff Normalized, No Trans Line, All Causes	0.01	0.03	0.02	0.03	0.04	0.07	0.12	0.07	0.04	0.04	0.01	0.02	0.50
Annual Normalized, All Levels, All Causes	0.02	0.03	0.04	0.06	0.07	0.07	0.16	0.09	0.05	0.04	0.03	0.04	0.72
2010 With Storms, All Levels, All Causes	0.04	0.01	0.02	0.10	0.10	0.18	0.21	0.17	0.10	0.09	0.10	0.07	1.17
New Tariff Normalized, No Trans Line, All Causes	0.02	0.00	0.02	0.06	0.08	0.08	0.14	0.12	0.06	0.04	0.06	0.04	0.72
Annual Normalized, All Levels, All Causes	0.04	0.01	0.02	0.10	0.10	0.11	0.19	0.14	0.10	0.04	0.06	0.07	0.95
2009 With Storms, All Levels, All Causes	0.01	0.07	0.05	0.09	0.08	0.16	0.09	0.16	0.06	0.07	0.04	0.02	0.89
New Tariff Normalized, No Trans Line, All Causes	0.01	0.05	0.04	0.09	0.07	0.12	0.06	0.10	0.04	0.06	0.03	0.01	0.67
Annual Normalized, All Levels, All Causes	0.01	0.07	0.05	0.09	0.04	0.16	0.09	0.16	0.06	0.07	0.04	0.02	0.86

MAIFI - <= 5 Minutes Duration

Metro East - MAIFI	January	February	March	April	May	June	July	August	September	October	November	December	YTD
2013 With Storms, All Levels, All Causes	0.04	0.05	0.04	0.12	0.11	0.27	0.07	0.05	0.09	0.05	0.03	0.04	0.97
New Tariff Normalized, No Trans Line, All Causes	0.04	0.04	0.04	0.12	0.10	0.10	0.07	0.05	0.09	0.05	0.03	0.04	0.77
Annual Normalized, All Levels, All Causes	0.04	0.05	0.04	0.12	0.11	0.10	0.07	0.05	0.09	0.05	0.03	0.04	0.80
2012 With Storms, All Levels, All Causes	0.02	0.02	0.07	0.11	0.11	0.19	0.11	0.14	0.07	0.04	0.02	0.03	0.95
New Tariff Normalized, No Trans Line, All Causes	0.02	0.02	0.07	0.11	0.11	0.13	0.09	0.10	0.07	0.04	0.00	0.03	0.81
Annual Normalized, All Levels, All Causes	0.02	0.01	0.07	0.11	0.11	0.13	0.10	0.13	0.07	0.04	0.02	0.03	0.85
2011 With Storms, All Levels, All Causes	0.04	0.01	0.05	0.04	0.08	0.09	0.23	0.10	0.09	0.02	0.01	0.04	0.80
New Tariff Normalized, No Trans Line, All Causes	0.01	0.01	0.03	0.04	0.07	0.09	0.15	0.10	0.05	0.02	0.00	0.02	0.59
Annual Normalized, All Levels, All Causes	0.04	0.01	0.05	0.04	0.08	0.09	0.17	0.05	0.09	0.02	0.01	0.04	0.69
2010 With Storms, All Levels, All Causes	0.06	0.00	0.03	0.09	0.13	0.18	0.22	0.12	0.08	0.09	0.10	0.06	1.18
New Tariff Normalized, No Trans Line, All Causes	0.02	0.00	0.03	0.08	0.13	0.08	0.19	0.09	0.08	0.05	0.08	0.05	0.89
Annual Normalized, All Levels, All Causes	0.06	0.00	0.03	0.09	0.13	0.10	0.19	0.08	0.08	0.04	0.08	0.06	0.97
2009 With Storms, All Levels, All Causes	0.01	0.12	0.05	0.04	0.09	0.12	0.07	0.11	0.05	0.05	0.03	0.00	0.75
New Tariff Normalized, No Trans Line, All Causes	0.01	0.10	0.05	0.04	0.09	0.12	0.07	0.10	0.05	0.05	0.01	0.00	0.70
Annual Normalized, All Levels, All Causes	0.01	0.12	0.05	0.04	0.04	0.12	0.07	0.11	0.05	0.05	0.03	0.00	0.70

MAIFI - <= 5 Minutes Duration

Metro West - MAIFI	January	February	March	April	May	June	July	August	September	October	November	December	YTD
2013 With Storms, All Levels, All Causes	0.02	0.02	0.05	0.07	0.06	0.18	0.15	0.16	0.03	0.05	0.03	0.06	0.87
New Tariff Normalized, No Trans Line, All Causes	0.02	0.02	0.05	0.05	0.06	0.09	0.13	0.09	0.03	0.05	0.02	0.02	0.65
Annual Normalized, All Levels, All Causes	0.02	0.02	0.05	0.07	0.06	0.11	0.15	0.13	0.03	0.05	0.03	0.06	0.77
2012 With Storms, All Levels, All Causes	0.02	0.05	0.11	0.06	0.14	0.18	0.09	0.13	0.11	0.06	0.05	0.02	1.01
New Tariff Normalized, No Trans Line, All Causes	0.02	0.04	0.06	0.04	0.13	0.11	0.07	0.08	0.09	0.06	0.05	0.02	0.76
Annual Normalized, All Levels, All Causes	0.02	0.04	0.11	0.06	0.14	0.16	0.09	0.11	0.11	0.06	0.05	0.02	0.96
2011 With Storms, All Levels, All Causes	0.02	0.04	0.03	0.09	0.11	0.06	0.25	0.10	0.06	0.06	0.03	0.04	0.89
New Tariff Normalized, No Trans Line, All Causes	0.02	0.04	0.02	0.03	0.02	0.05	0.12	0.06	0.06	0.06	0.01	0.03	0.52
Annual Normalized, All Levels, All Causes	0.02	0.04	0.03	0.09	0.08	0.04	0.19	0.06	0.05	0.06	0.03	0.04	0.72
2010 With Storms, All Levels, All Causes	0.01	0.01	0.01	0.09	0.06	0.20	0.19	0.18	0.10	0.11	0.09	0.05	1.10
New Tariff Normalized, No Trans Line, All Causes	0.01	0.01	0.01	0.07	0.06	0.09	0.13	0.15	0.07	0.04	0.05	0.04	0.72
Annual Normalized, All Levels, All Causes	0.01	0.01	0.01	0.09	0.06	0.12	0.18	0.18	0.10	0.04	0.06	0.05	0.92
2009 With Storms, All Levels, All Causes	0.01	0.07	0.05	0.14	0.06	0.19	0.10	0.14	0.03	0.08	0.03	0.02	0.93
New Tariff Normalized, No Trans Line, All Causes	0.01	0.04	0.04	0.14	0.06	0.15	0.06	0.10	0.03	0.07	0.03	0.02	0.77
Annual Normalized, All Levels, All Causes	0.01	0.07	0.05	0.14	0.03	0.19	0.10	0.14	0.03	0.08	0.03	0.02	0.91

MAIFI - <= 5 Minutes Duration

Northwest - MAIFI	January	February	March	April	May	June	July	August	September	October	November	December	YTD
2013 With Storms, All Levels, All Causes	0.08	0.10	0.10	0.20	0.18	0.65	0.04	0.15	0.05	0.09	0.01	0.16	1.82
New Tariff Normalized, No Trans Line, All Causes	0.05	0.03	0.09	0.16	0.10	0.06	0.04	0.04	0.03	0.06	0.00	0.01	0.67
Annual Normalized, All Levels, All Causes	0.08	0.10	0.10	0.20	0.18	0.11	0.04	0.15	0.05	0.09	0.01	0.16	1.28
2012 With Storms, All Levels, All Causes	0.02	0.00	0.03	0.16	0.35	0.26	0.20	0.12	0.06	0.05	0.01	0.16	1.42
New Tariff Normalized, No Trans Line, All Causes	0.02	0.00	0.03	0.11	0.26	0.13	0.11	0.05	0.06	0.05	0.01	0.12	0.96
Annual Normalized, All Levels, All Causes	0.02	0.00	0.03	0.16	0.35	0.26	0.20	0.12	0.06	0.05	0.01	0.16	1.42
2011 With Storms, All Levels, All Causes	0.04	0.04	0.02	0.05	0.06	0.12	0.40	0.72	0.00	0.04	0.07	0.04	1.59
New Tariff Normalized, No Trans Line, All Causes	0.00	0.01	0.00	0.02	0.00	0.09	0.15	0.08	0.00	0.01	0.02	0.00	0.38
Annual Normalized, All Levels, All Causes	0.04	0.04	0.02	0.05	0.02	0.09	0.10	0.15	0.00	0.04	0.07	0.04	0.65
2010 With Storms, All Levels, All Causes	0.04	0.00	0.02	0.16	0.23	0.16	0.19	0.17	0.11	0.09	0.05	0.15	1.38
New Tariff Normalized, No Trans Line, All Causes	0.03	0.00	0.01	0.01	0.12	0.12	0.11	0.10	0.00	0.00	0.05	0.04	0.61
Annual Normalized, All Levels, All Causes	0.04	0.00	0.02	0.16	0.22	0.06	0.11	0.14	0.11	0.01	0.05	0.15	1.07
2009 With Storms, All Levels, All Causes	0.00	0.00	0.06	0.08	0.06	0.18	0.12	0.33	0.13	0.05	0.10	0.02	1.12
New Tariff Normalized, No Trans Line, All Causes	0.00	0.00	0.04	0.08	0.05	0.08	0.02	0.12	0.10	0.00	0.10	0.00	0.59
Annual Normalized, All Levels, All Causes	0.00	0.00	0.06	0.08	0.06	0.18	0.12	0.33	0.13	0.05	0.10	0.02	1.12

MAIFI - <= 5 Minutes Duration

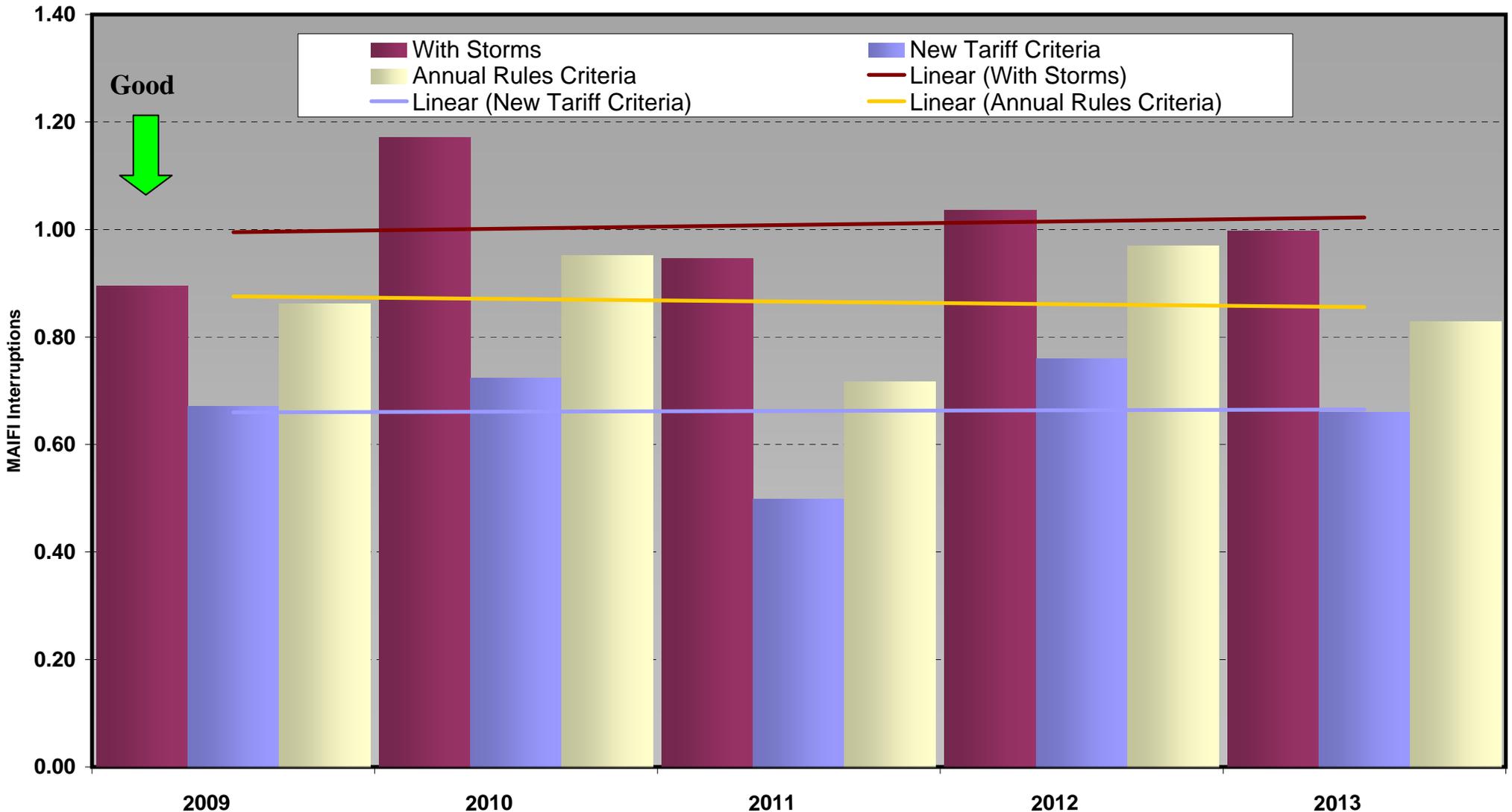
Southeast - MAIFI	January	February	March	April	May	June	July	August	September	October	November	December	YTD
2013 With Storms, All Levels, All Causes	0.04	0.03	0.00	0.12	0.12	0.11	0.10	0.06	0.03	0.09	0.02	0.15	0.89
New Tariff Normalized, No Trans Line, All Causes	0.02	0.02	0.00	0.09	0.03	0.01	0.06	0.03	0.03	0.03	0.01	0.01	0.35
Annual Normalized, All Levels, All Causes	0.04	0.03	0.00	0.12	0.06	0.11	0.09	0.06	0.03	0.06	0.02	0.15	0.78
2012 With Storms, All Levels, All Causes	0.05	0.00	0.07	0.00	0.17	0.16	0.30	0.20	0.04	0.04	0.04	0.00	1.08
New Tariff Normalized, No Trans Line, All Causes	0.05	0.00	0.00	0.00	0.04	0.04	0.11	0.05	0.03	0.04	0.00	0.00	0.37
Annual Normalized, All Levels, All Causes	0.05	0.00	0.07	0.00	0.17	0.07	0.30	0.19	0.03	0.04	0.04	0.00	0.95
2011 With Storms, All Levels, All Causes	0.00	0.03	0.05	0.04	0.03	0.19	0.29	0.30	0.00	0.01	0.09	0.05	1.09
New Tariff Normalized, No Trans Line, All Causes	0.00	0.00	0.01	0.00	0.02	0.06	0.02	0.06	0.00	0.01	0.01	0.02	0.22
Annual Normalized, All Levels, All Causes	0.00	0.03	0.05	0.04	0.03	0.17	0.10	0.30	0.00	0.01	0.09	0.05	0.87
2010 With Storms, All Levels, All Causes	0.09	0.00	0.02	0.07	0.09	0.13	0.29	0.23	0.10	0.02	0.15	0.09	1.29
New Tariff Normalized, No Trans Line, All Causes	0.04	0.00	0.00	0.03	0.02	0.02	0.10	0.04	0.02	0.02	0.02	0.01	0.32
Annual Normalized, All Levels, All Causes	0.09	0.00	0.02	0.07	0.09	0.10	0.23	0.10	0.10	0.02	0.03	0.09	0.95
2009 With Storms, All Levels, All Causes	0.00	0.01	0.00	0.03	0.10	0.10	0.12	0.27	0.12	0.10	0.05	0.06	0.97
New Tariff Normalized, No Trans Line, All Causes	0.00	0.00	0.00	0.01	0.07	0.02	0.06	0.02	0.01	0.03	0.01	0.01	0.22
Annual Normalized, All Levels, All Causes	0.00	0.01	0.00	0.03	0.08	0.10	0.12	0.27	0.12	0.10	0.05	0.06	0.94
MAIFI - <= 5 Minutes Duration													
Minnesota - Customer Interruptions	January	February	March	April	May	June	July	August	September	October	November	December	YTD
2013 With Storms, All Levels, All Causes	41,377	50,759	60,258	126,599	114,691	300,256	127,829	138,192	63,215	68,852	36,139	87,140	1,215,307
New Tariff Normalized, No Trans Line, All Causes	34,756	37,653	59,557	108,798	90,004	103,795	115,930	84,449	57,098	57,650	25,936	28,583	804,209
Annual Normalized, All Levels, All Causes	41,377	50,759	60,258	124,501	107,258	128,206	126,006	120,234	63,215	65,498	36,139	87,140	1,010,591
CES Cust Served	1,217,604	1,218,204	1,219,026	1,219,379	1,218,531	1,218,072	1,218,582	1,218,899	1,219,310	1,220,894	1,221,687	1,222,327	
2012 With Storms, All Levels, All Causes	27,803	34,536	102,984	97,500	187,066	227,323	157,721	170,945	103,140	64,880	42,420	45,544	1,261,862
New Tariff Normalized, No Trans Line, All Causes	27,803	31,244	67,550	81,281	154,532	135,931	104,772	98,842	93,541	64,329	28,593	37,107	925,525
Annual Normalized, All Levels, All Causes	27,803	28,373	102,984	97,500	187,066	178,479	151,053	154,352	101,159	64,880	42,420	45,544	1,181,613
CES Cust Served	1,217,604	1,218,204	1,219,026	1,219,379	1,218,531	1,218,072	1,218,582	1,218,899	1,219,310	1,220,894	1,221,687	1,222,327	
2011 With Storms, All Levels, All Causes	26,901	37,715	45,283	77,141	107,411	107,776	314,468	221,781	68,865	48,560	41,812	49,261	1,146,974
New Tariff Normalized, No Trans Line, All Causes	13,486	31,385	25,285	34,935	45,292	82,372	146,336	87,801	52,280	44,780	10,106	30,173	604,231
Annual Normalized, All Levels, All Causes	26,901	37,715	45,283	77,141	84,172	89,081	199,599	107,383	62,176	48,560	41,812	49,261	869,084
CES Cust Served	1,212,838	1,213,598	1,213,870	1,213,718	1,213,054	1,212,361	1,212,745	1,213,005	1,213,888	1,214,808	1,215,579	1,216,748	
2010 With Storms, All Levels, All Causes	42,415	6,091	26,315	118,158	120,150	219,741	252,955	200,022	116,195	111,459	115,905	79,997	1,409,403
New Tariff Normalized, No Trans Line, All Causes	18,807	5,540	22,938	76,115	98,951	97,647	173,134	140,044	73,401	49,073	68,102	46,748	870,500
Annual Normalized, All Levels, All Causes	42,415	6,091	26,315	118,158	118,797	126,727	222,117	164,013	115,853	46,857	77,698	79,997	1,145,038
CES Cust Served	1,198,714	1,199,720	1,200,253	1,200,811	1,200,350	1,200,094	1,200,357	1,201,480	1,201,859	1,209,560	1,210,858	1,211,897	
2009 With Storms, All Levels, All Causes	9,991	87,100	56,442	110,638	90,128	191,933	109,664	194,657	68,261	83,133	46,076	20,810	1,068,833
New Tariff Normalized, No Trans Line, All Causes	9,991	57,747	50,543	107,815	83,361	145,860	70,494	113,735	51,065	66,049	31,786	13,191	801,637
Annual Normalized, All Levels, All Causes	9,991	87,100	56,442	110,638	51,772	191,933	109,664	194,657	68,261	83,133	46,076	20,810	1,030,477
CES Cust Served	1,195,002	1,195,267	1,195,803	1,195,655	1,195,655	1,195,655	1,193,630	1,193,859	1,193,926	1,195,559	1,196,327	1,197,693	

Metro East - Customer Interruptions		January	February	March	April	May	June	July	August	September	October	November	December	YTD
2013	With Storms, All Levels, All Causes	17,691	21,577	16,627	49,307	44,434	106,410	26,547	21,835	37,927	18,819	13,534	14,335	389,043
	New Tariff Normalized, No Trans Line, All Causes	17,691	18,012	16,627	49,307	39,834	41,338	26,547	21,835	34,170	18,819	10,738	14,335	309,253
	Annual Normalized, All Levels, All Causes	17,691	21,577	16,627	47,209	44,434	41,280	26,547	21,835	37,927	18,819	13,534	14,335	321,815
	CES Cust Served	401,230	401,501	401,871	402,068	401,714	401,535	401,482	401,644	401,861	402,237	402,471	402,927	
2012	With Storms, All Levels, All Causes	9,429	7,657	29,988	44,236	45,887	75,216	45,177	55,701	29,928	17,646	8,524	13,069	382,458
	New Tariff Normalized, No Trans Line, All Causes	9,429	7,657	29,988	44,236	45,887	50,292	37,309	41,817	29,928	17,646	1	13,069	327,259
	Annual Normalized, All Levels, All Causes	9,429	4,786	29,988	44,236	45,887	50,292	38,509	50,798	29,928	17,646	8,524	13,069	343,092
	CES Cust Served	401,230	401,501	401,871	402,068	401,714	401,535	401,482	401,644	401,861	402,237	402,471	402,927	
2011	With Storms, All Levels, All Causes	14,026	5,853	18,212	16,531	32,944	36,717	90,513	41,654	34,921	6,655	3,330	17,534	318,890
	New Tariff Normalized, No Trans Line, All Causes	4,766	5,853	12,511	16,448	29,296	36,717	60,931	38,188	18,336	6,655	43	7,369	237,113
	Annual Normalized, All Levels, All Causes	14,026	5,853	18,212	16,531	32,944	36,717	68,236	19,451	34,921	6,655	3,330	17,534	274,410
	CES Cust Served	399,516	399,834	399,941	399,885	399,856	399,569	399,678	399,623	399,896	400,093	400,417	400,875	
2010	With Storms, All Levels, All Causes	23,545	1,334	13,386	37,096	49,923	72,249	86,135	49,188	31,684	37,674	39,224	24,304	465,742
	New Tariff Normalized, No Trans Line, All Causes	8,028	1,334	13,386	31,903	49,923	30,254	76,091	36,891	31,684	21,719	31,926	18,052	351,191
	Annual Normalized, All Levels, All Causes	23,545	1,334	13,386	37,096	49,923	41,393	76,955	32,852	31,342	17,897	32,169	24,304	382,196
	CES Cust Served	394,519	394,917	395,305	395,387	395,356	395,127	395,214	395,521	395,683	398,307	398,750	399,163	
2009	With Storms, All Levels, All Causes	1,989	45,938	21,471	16,097	36,906	48,820	28,138	42,104	20,579	20,756	10,479	1,774	295,051
	New Tariff Normalized, No Trans Line, All Causes	1,989	37,721	21,471	16,097	36,906	48,820	26,391	39,087	20,579	20,754	2,304	1,774	273,893
	Annual Normalized, All Levels, All Causes	1,989	45,938	21,471	16,097	15,386	48,820	28,138	42,104	20,579	20,756	10,479	1,774	273,531
	CES Cust Served	392,835	392,989	393,225	393,114	393,114	393,114	392,792	392,827	392,861	393,353	393,598	394,138	
Metro West - Customer Interruptions		January	February	March	April	May	June	July	August	September	October	November	December	YTD
2013	With Storms, All Levels, All Causes	9,069	12,973	31,592	38,102	34,675	104,623	83,557	90,881	15,726	28,293	18,748	35,661	503,900
	New Tariff Normalized, No Trans Line, All Causes	9,069	12,973	31,592	29,691	34,675	54,484	76,404	54,616	15,726	28,293	13,612	12,249	373,384
	Annual Normalized, All Levels, All Causes	9,069	12,973	31,592	38,102	34,675	60,803	83,557	72,923	15,726	28,293	18,748	35,661	442,122
	CES Cust Served	575,169	575,376	575,700	575,827	575,632	575,368	575,904	575,882	575,985	576,891	577,363	577,422	
2012	With Storms, All Levels, All Causes	9,482	26,854	61,753	35,017	79,060	101,289	52,264	75,539	61,336	35,897	27,008	13,559	579,058
	New Tariff Normalized, No Trans Line, All Causes	9,482	23,562	34,254	23,928	73,461	65,101	39,859	44,430	53,364	35,897	27,008	10,010	440,356
	Annual Normalized, All Levels, All Causes	9,482	23,562	61,753	35,017	79,060	89,271	52,264	65,334	61,336	35,897	27,008	13,559	553,543
	CES Cust Served	575,169	575,376	575,700	575,827	575,632	575,368	575,904	575,882	575,985	576,891	577,363	577,422	
2011	With Storms, All Levels, All Causes	8,720	23,830	18,125	49,543	63,679	33,489	141,074	59,901	33,641	35,411	19,442	21,122	507,977
	New Tariff Normalized, No Trans Line, All Causes	8,720	23,830	11,742	15,747	13,044	28,035	65,969	33,214	33,641	35,411	6,005	19,996	295,354
	Annual Normalized, All Levels, All Causes	8,720	23,830	18,125	49,543	45,410	20,480	108,233	33,617	26,952	35,411	19,442	21,122	410,885
	CES Cust Served	572,913	573,235	573,337	573,231	573,047	572,642	572,899	572,948	573,450	574,006	574,259	574,791	
2010	With Storms, All Levels, All Causes	2,968	3,760	7,722	53,314	32,479	112,337	108,621	103,180	59,310	61,440	51,813	27,030	623,974
	New Tariff Normalized, No Trans Line, All Causes	2,968	3,760	7,722	39,283	32,479	50,658	71,820	86,922	39,252	25,116	27,437	22,114	409,531
	Annual Normalized, All Levels, All Causes	2,968	3,760	7,722	53,314	32,479	66,770	103,957	103,180	59,310	25,367	35,405	27,030	521,262
	CES Cust Served	565,198	565,589	566,083	566,132	565,860	565,663	565,848	566,346	566,433	571,447	572,081	572,542	
2009	With Storms, All Levels, All Causes	8,001	40,037	28,412	80,835	33,002	109,876	53,591	81,005	18,522	44,137	17,831	10,276	525,525
	New Tariff Normalized, No Trans Line, All Causes	8,001	20,024	24,656	80,835	31,911	85,865	35,213	58,415	18,522	41,644	17,613	10,276	432,975
	Annual Normalized, All Levels, All Causes	8,001	40,037	28,412	80,835	19,478	109,876	53,591	81,005	18,522	44,137	17,831	10,276	512,001
	CES Cust Served	563,921	563,919	564,190	564,183	564,183	564,183	563,039	562,981	562,862	563,702	564,083	564,658	

Northwest - Customer Interruptions		January	February	March	April	May	June	July	August	September	October	November	December	YTD
2013	With Storms, All Levels, All Causes	9,769	12,000	11,519	23,847	20,437	75,560	5,032	17,369	5,715	10,638	946	18,955	211,787
	New Tariff Normalized, No Trans Line, All Causes	5,465	3,656	10,818	18,389	12,105	6,475	5,032	4,530	3,355	7,255	17	1,238	78,335
	Annual Normalized, All Levels, All Causes	9,769	12,000	11,519	23,847	20,437	12,460	5,032	17,369	5,715	10,638	946	18,955	148,687
	CES Cust Served	116,430	116,469	116,506	116,468	116,398	116,400	116,444	116,517	116,547	116,669	116,683	116,749	
2012	With Storms, All Levels, All Causes	2,855		3,052	18,245	41,144	30,468	23,222	14,130	6,615	5,728	1,584	18,908	165,951
	New Tariff Normalized, No Trans Line, All Causes	2,855		3,052	13,115	30,118	15,091	13,327	5,760	6,615	5,728	1,584	14,020	111,265
	Annual Normalized, All Levels, All Causes	2,855		3,052	18,245	41,144	30,468	23,222	14,130	6,615	5,728	1,584	18,908	165,951
	CES Cust Served	116,430	116,469	116,506	116,468	116,398	116,400	116,444	116,517	116,547	116,669	116,683	116,749	
2011	With Storms, All Levels, All Causes	4,155	4,358	2,183	5,964	7,427	13,797	46,796	83,319		4,773	8,009	4,117	184,898
	New Tariff Normalized, No Trans Line, All Causes		1,702	2	2,227	300	10,361	16,881	9,471		993	2,483		44,420
	Annual Normalized, All Levels, All Causes	4,155	4,358	2,183	5,964	2,457	10,581	11,205	17,408		4,773	8,009	4,117	75,210
	CES Cust Served	116,117	116,152	116,219	116,207	116,141	115,972	115,994	116,076	116,095	116,211	116,290	116,378	
2010	With Storms, All Levels, All Causes	4,454	446	2,245	18,635	27,098	18,574	22,232	19,481	12,691	10,155	5,884	17,443	159,338
	New Tariff Normalized, No Trans Line, All Causes	3,379	446	1,312	773	14,140	14,035	12,875	11,687	296	77	5,884	5,106	70,010
	Annual Normalized, All Levels, All Causes	4,454	446	2,245	18,635	25,745	6,526	12,409	16,197	12,691	1,432	5,884	17,443	124,107
	CES Cust Served	115,187	115,311	114,881	115,413	115,341	115,598	115,666	115,813	115,843	115,904	115,961	116,034	
2009	With Storms, All Levels, All Causes	1		6,559	9,566	7,398	20,304	13,605	38,111	14,489	5,714	11,139	1,846	128,732
	New Tariff Normalized, No Trans Line, All Causes	1		4,416	9,566	6,104	8,905	1,819	14,268	11,030	1	11,139		67,249
	Annual Normalized, All Levels, All Causes	1		6,559	9,566	7,398	20,304	13,605	38,111	14,489	5,714	11,139	1,846	128,732
	CES Cust Served	114,818	114,892	114,919	114,876	114,876	114,876	114,659	114,755	114,769	114,875	114,947	115,111	
Southeast - Customer Interruptions		January	February	March	April	May	June	July	August	September	October	November	December	YTD
2013	With Storms, All Levels, All Causes	4,848	4,209	520	15,343	15,145	13,663	12,693	8,107	3,847	11,102	2,911	18,189	110,577
	New Tariff Normalized, No Trans Line, All Causes	2,531	3,012	520	11,411	3,390	1,498	7,947	3,468	3,847	3,283	1,569	761	43,237
	Annual Normalized, All Levels, All Causes	4,848	4,209	520	15,343	7,712	13,663	10,870	8,107	3,847	7,748	2,911	18,189	97,967
	CES Cust Served	124,775	124,858	124,949	125,016	124,787	124,769	124,752	124,856	124,917	125,097	125,170	125,229	
2012	With Storms, All Levels, All Causes	6,037	25	8,191	2	20,975	20,350	37,058	25,575	5,261	5,609	5,304	8	134,395
	New Tariff Normalized, No Trans Line, All Causes	6,037	25	256	2	5,066	5,447	14,277	6,835	3,634	5,058		8	46,645
	Annual Normalized, All Levels, All Causes	6,037	25	8,191	2	20,975	8,448	37,058	24,090	3,280	5,609	5,304	8	119,027
	CES Cust Served	124,775	124,858	124,949	125,016	124,787	124,769	124,752	124,856	124,917	125,097	125,170	125,229	
2011	With Storms, All Levels, All Causes		3,674	6,763	5,103	3,361	23,773	36,085	36,907	303	1,721	11,031	6,488	135,209
	New Tariff Normalized, No Trans Line, All Causes			1,030	513	2,652	7,259	2,555	6,928	303	1,721	1,575	2,808	27,344
	Annual Normalized, All Levels, All Causes		3,674	6,763	5,103	3,361	21,303	11,925	36,907	303	1,721	11,031	6,488	108,579
	CES Cust Served	124,292	124,377	124,373	124,395	124,010	124,178	124,174	124,358	124,447	124,498	124,613	124,704	
2010	With Storms, All Levels, All Causes	11,448	551	2,962	9,113	10,650	16,581	35,967	28,173	12,510	2,190	18,984	11,220	160,349
	New Tariff Normalized, No Trans Line, All Causes	4,432		518	4,156	2,409	2,700	12,348	4,544	2,169	2,161	2,855	1,476	39,768
	Annual Normalized, All Levels, All Causes	11,448	551	2,962	9,113	10,650	12,038	28,796	11,784	12,510	2,161	4,240	11,220	117,473
	CES Cust Served	123,810	123,903	123,984	123,879	123,793	123,706	123,629	123,800	123,900	123,902	124,066	124,158	
2009	With Storms, All Levels, All Causes		1,125		4,140	12,822	12,933	14,330	33,437	14,671	12,526	6,627	6,914	119,525
	New Tariff Normalized, No Trans Line, All Causes		2		1,317	8,440	2,270	7,071	1,965	934	3,650	730	1,141	27,520
	Annual Normalized, All Levels, All Causes		1,125		4,140	9,510	12,933	14,330	33,437	14,671	12,526	6,627	6,914	116,213
	CES Cust Served	123,428	123,467	123,469	123,482	123,482	123,482	123,140	123,296	123,434	123,629	123,699	123,786	



MINNESOTA MAIFI



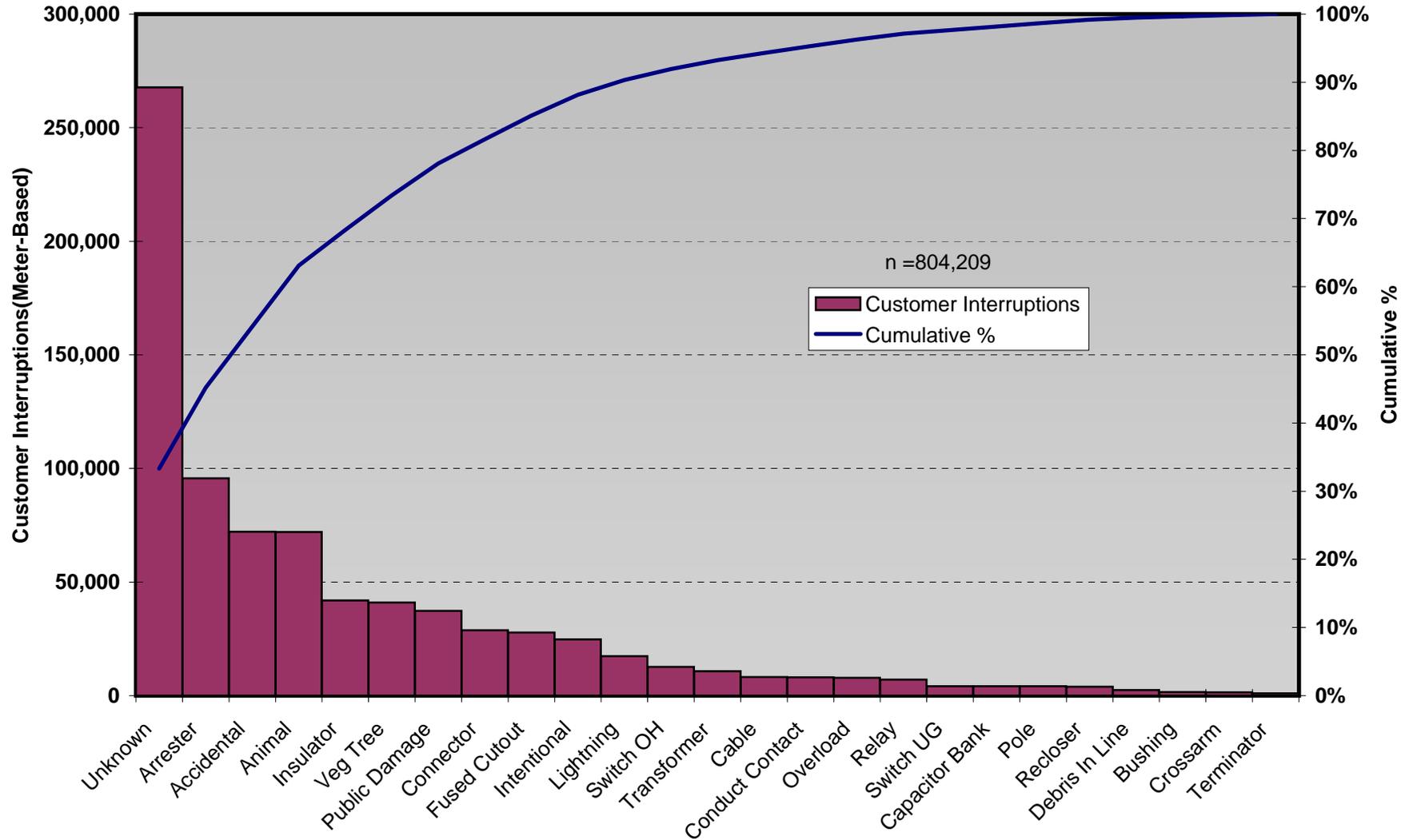
With Storms - No normalization, All Levels, All Causes
 New Tariff - IEEE Normalization after removing Trans Lines, All Causes

Annual Rules - Normalized on Count of Outages, 5 year -rolling 3 sigma, All Levels, All Causes
 Momentary events <= 5 Minutes



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2013, MN Tariff, No Transmission Lines, All Causes



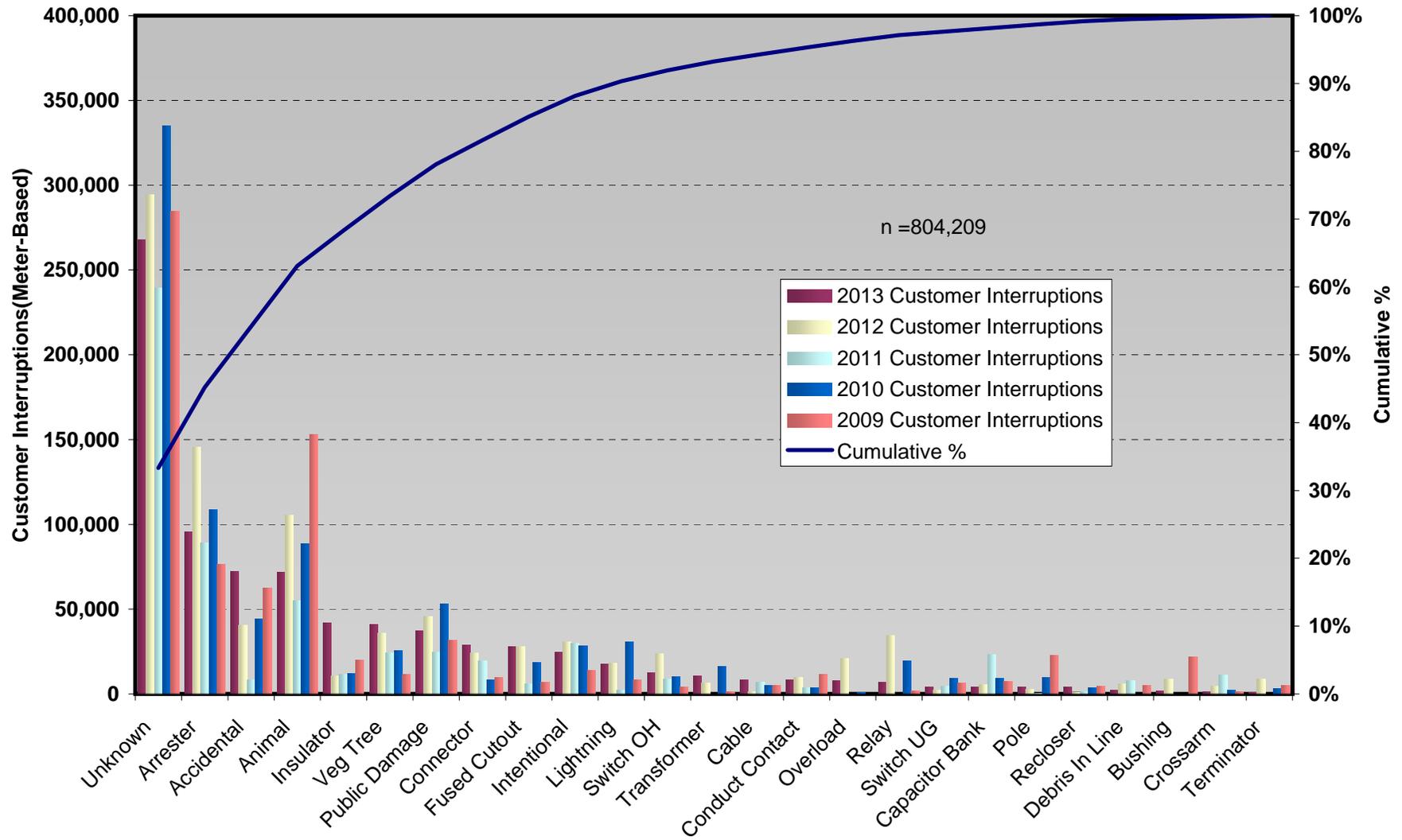
New Tariff - IEEE Normalization after removing Trans Lines, All Causes

Momentary events <= 5 Minutes



MINNESOTA MAIFI

5 Year, MN Tariff, No Transmission Lines, All Causes



New Tariff - IEEE Normalization after removing Trans Lines, All Causes

Momentary events <= 5 Minutes

Utility	Work_Resolution	Data	Data												Grand Total
			Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	
Electric	INVESTIGATE AND REMEDIATE	Order Count	156	126	147	131	126	142	216	232	187	177	165	135	1,940
		Average Days	3.03	2.79	2.80	2.93	2.62	2.73	3.15	2.72	2.92	3.11	3.27	3.79	2.99
		Min Days	1	0	1	0	1	1	1	1	1	1	1	0	0
		Max of Days	6	6	7	6	5	5	9	7	5	10	7	6	10
		StdDev of Days	1.29	1.37	1.16	1.39	1.09	1.09	1.51	1.13	1.20	1.29	1.46	1.60	1.33
	INVESTIGATE AND REFER	Order Count	15	26	20	29	22	13	28	24	21	20	13	32	263
		Average Days	3.53	3.31	2.60	3.17	2.68	2.46	3.64	2.42	3.71	3.20	3.00	3.38	3.13
		Min Days	2	1	2	2	2	1	2	1	2	1	1	1	1
		Max of Days	6	5	4	9	5	5	9	4	5	6	6	6	9
		StdDev of Days	1.30	1.29	0.88	1.63	1.17	1.13	2.09	0.93	1.23	1.44	1.58	1.16	1.42
	REMEDiate UPON REFERRAL	Order Count		1	1				2	1	2	2		2	11
		Average Days		0.00	1.00				0.00	0.00	0.00	0.00		0.50	0.18
		Min Days		0	1				0	0	0	0		0	0
Max of Days			0	1				0	0	0	0		1	1	
StdDev of Days								0.00		0.00	0.00		0.71	0.40	
Electric Order Count			171	153	168	160	148	155	246	257	210	199	178	169	2,214
Electric Average Days			3.08	2.86	2.76	2.98	2.63	2.70	3.18	2.68	2.97	3.09	3.25	3.67	2.99
Electric Min Days			1	0	1	0	1	1	0	0	0	0	0	0	0
Electric Max of Days			6	6	7	9	5	5	9	7	5	10	7	6	10
Electric StdDev of Days			1.30	1.38	1.13	1.43	1.10	1.09	1.61	1.12	1.25	1.33	1.47	1.56	1.36

Gas	INVESTIGATE AND REMEDIATE	Order Count	116	145	162	203	159	115	161	127	156	159	86	126	1,715	
		Average Days	3.15	3.53	3.02	2.93	3.04	2.79	2.89	2.80	2.92	2.70	3.29	3.78	3.05	
		Min Days	1	0	0	0	0	0	0	0	0	0	0	0	1	0
		Max of Days	11	8	8	6	11	10	6	8	7	7	7	8	8	11
		StdDev of Days	1.85	1.67	1.39	1.41	1.59	1.32	1.45	1.44	1.46	1.41	1.59	1.83	1.55	
	INVESTIGATE AND REFER	Order Count	60	115	105	132	94	59	75	71	71	69	37	48	936	
		Average Days	2.75	3.13	2.77	3.14	2.72	3.02	3.15	2.75	2.99	2.94	3.24	3.90	3.01	
		Min Days	1	1	0	1	1	2	1	1	1	2	1	1	0	
		Max of Days	7	8	6	6	7	6	6	6	6	6	7	8	8	
		StdDev of Days	1.28	1.48	1.15	1.12	1.15	1.06	1.44	1.09	1.19	1.06	1.53	1.68	1.28	
	REMEDiate UPON REFERRAL	Order Count	31	84	89	111	85	51	50	52	27	22	16	17	635	
		Average Days	4.74	3.07	2.58	2.54	5.24	2.41	3.72	2.13	2.37	3.50	3.75	3.71	3.22	
		Min Days	0	0	0	0	0	0	1	0	0	1	0	1	0	
Max of Days		15	9	8	11	14	11	12	10	7	12	11	11	15		
StdDev of Days		4.20	2.66	2.11	2.37	4.11	2.48	2.80	1.85	1.98	2.81	3.26	3.06	2.98		
Gas Order Count			207	344	356	446	338	225	286	250	254	250	139	191	3,286	
Gas Average Days			3.27	3.28	2.84	2.89	3.50	2.76	3.10	2.64	2.88	2.84	3.33	3.80	3.07	
Gas Min Days			0	0	0	0	0	0	0	0	0	0	0	1	0	
Gas Max of Days			15	9	8	11	14	11	12	10	7	12	11	11	15	
Gas StdDev of Days			2.32	1.91	1.55	1.65	2.61	1.61	1.78	1.47	1.46	1.51	1.83	1.92	1.86	
Total E & G Order Count			378	497	524	606	486	380	532	507	464	449	317	360	5,500	
Total E & G Average Days			3.18	3.15	2.81	2.91	3.24	2.74	3.14	2.66	2.92	2.95	3.29	3.74	3.04	
Total E & G Days Min			0	0	0	0	0	0	0	0	0	0	0	0	0	
Total E & G Days Max			15	9	8	11	14	11	12	10	7	12	11	11	15	
Total E & G Days Std Dev			1.92	1.77	1.43	1.59	2.29	1.42	1.70	1.30	1.37	1.44	1.63	1.76	1.67	

EXCLUSIONS

Meter Access

Utility	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Grand Total
Electric Order Count	6	11	40	47	48	37	38	5	33	11	5	6	287
Electric Average Days	168.67	121.73	182.83	151.45	72.31	61.41	69.71	11.20	56.09	55.82	126.60	59.50	99.95
Gas Order Count	23	43	131	98	94	64	23	30	32	43	18	9	608
Gas Average Days	107.48	68.53	109.31	96.40	67.93	69.58	23.91	57.70	55.91	35.81	44.17	45.11	77.03
Total E & G Order Count	29	54	171	145	142	101	61	35	65	54	23	15	895
Total E & G Average Days	120.14	79.37	126.50	114.24	69.41	66.58	52.44	51.06	56.00	39.89	62.09	50.87	84.38
Environmental													
Electric Order Count	0	0	0	0	0	0	0	3	0	0	0	0	0
Electric Average Days	0	0	0	0	0	0	0	9	0	0	0	0	0

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Below are our responses to the Commission's February 18, 2014 Notice Requesting Information from Xcel on Substation Equipment Reliability in Docket No. E002/M-14-131

1. Have any employees or contractors of Xcel Energy complained of equipment problems at any Minnesota substation in the last 5 years? What is the current status of these concerns and what is Xcel's position as of today?

Employee allegations of equipment problems led to an investigation by Minnesota Occupational Safety and Health Administration (OSHA) related to oil filled equipment in 2008. Minnesota OSHA never actually investigated onsite at any of the substations, but relied on photographic evidence in issuing a citation on January 27, 2009. The Minnesota OSHA citation was for a violation of the general duty clause, claiming that 13 pieces of Company equipment at three substations were low in oil.

Xcel Energy contested the citations claiming that the claims of improper maintenance were untrue. Xcel Energy and Minnesota OSHA settled the matter in March of 2011. The settlement agreement reduced the violation from serious to non-serious and reduced the penalty from \$3,000 to \$2,500. The citation language was also changed in the settlement agreement to better reflect the actual facts, which were that not all substation equipment alleged to be in need of repair actually was in need of repair, and that Xcel Energy hadn't neglected to repair equipment that needed repair.

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As discussed in our responses to the remaining questions below, our position today is that we do not believe the allegations raised by the individual with these other agencies had any merit. Although the Company has not had the opportunity to review the complaint made in the current MPUC docket, to the extent there is a similar basis we do not believe this allegation has any merit either.

2. Does Xcel Energy have a preventive maintenance program for its substation major equipment such as breakers, transformers and relay systems? If so, please describe how the program is implemented. Does Xcel ever operate its equipment on condition, also known as “operate to fail”, then repair or replace failed equipment?

Yes, Xcel Energy has a rigorous and thorough preventive maintenance and inspection program for our substation major equipment. We have implemented an Adaptive Reliability Centered Maintenance (ARCM) Program for preventive maintenance on circuit breakers and transformers. This program optimizes maintenance based on factors such as operational experience with different types of equipment performance, number of operations for breakers, number of fault interruptions for breakers and more. ARCM works from an algorithm that generates a prioritized list of assets most in need of maintenance and what the maintenance activity should be. A workbook containing the algorithm employs a formula that uses as many as 26 pieces of static and dynamic information to support the calculation of what Xcel Energy calls the “Maintenance Number” (Mn). The Mn is calculated independently for each asset currently in the program inside the fence of every substation in our system. The passage of time and accumulation of operational activity are examples of influences that will cause changes to the Mn. Assets receive maintenance, as determined by calculated Mn – assets with the highest Mn’s receive maintenance before assets with lower Mn’s.

This method of determining an annual maintenance portfolio puts manpower and monetary resources on the substation assets most logically in need of maintenance. The ARCM program is data driven – we no longer use a uniformly defined period-based maintenance program that has the potential of over-spending to maintain lightly used equipment or risking asset failure by under-maintaining other equipment that experiences heavy use .

In addition, all substation oil-filled equipment undergoes a detailed and well documented maintenance program which examines oil levels as follows:

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- (i) Annual Inspections;
- (ii) Two infrared scans of substation per year;
- (iii) Opportunistic inspections by crews who have other work in these substations; and
- (iv) Reports by employees.

There are approximately 5,000 specific oil-filled devices on the NSP system. The main purpose of the maintenance and inspection program is to identify and correct potential deficiencies before equipment failure occurs.

Our relay system maintenance is performed pursuant to the provisions of reliability standards (specifically PRC-005) adopted by NERC and approved by FERC that require that transmission-owning utilities adopt and implement programs to test and maintain protection systems, including (but not limited to) relays. Xcel Energy has a comprehensive protection system maintenance program in place to both maintain the reliability of the Company's transmission system and comply with NERC standards. NSP's compliance with these NERC requirements was audited by MRO in February 2014 with no findings of non-compliance. NSP's compliance with these NERC requirements was also audited in 2008 and 2011, with no findings of non-compliance regarding transmission substations.

With regard to the "operate to fail" question, Xcel Energy does not operate its substation equipment to failure, although despite our application of good utility practice and prudent engineering judgment, failures sometimes occur.

As described above, the Company has programs in place to test and maintain circuit breakers, transformers, and relays (and other protection systems) to ensure these facilities are in good working order. We plan to replace such equipment at the end of its useful life.

3. Does Xcel have a routine inspection program in place to inspect substation equipment for the purpose of identifying and to correct potential deficiencies, before equipment failure occurs? One recurring area of concern appears to be low oil level inside transformers and breakers or equipment leaking oil. Does Xcel employ an automated remote monitoring of equipment oil level using SCADA technology to allow for early detection of low oil condition?

Yes. In addition to the ARCM program described above, substation inspections are performed on a scheduled basis. These inspections check site cleanliness, equipment

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oil levels and existence of weeps, seeps and leaks, circuit breaker operational counter readings, meter readings, weed control, rodent control, equipment grounding, and overall equipment integrity. Action items that are identified from these inspections are noted and addressed on a prioritized basis according to operational experience with the equipment.

With respect to questions about low oil levels, please see our response to question two. Oil level gauge readings will vary over the course of a year depending on ambient temperatures, as the oil shrinks or expands. A low gauge reading also does not mean the tank on an oil-filled device is empty. The tank on a transformer may include thousands of gallons of oil, and the "sight glass" gauge does not provide an indication that the oil level is actually low. Such a reading means that the *monitored* portion of the oil—a relatively small percentage of the total oil—is below the volume required to register a gauge reading.

With regards to the automated remote monitoring question, most major substation transformers have oil level sensing alarms, and in some cases automatic isolation for low oil conditions. If a low oil situation were to occur, an alarm would be sent, via our Supervisory Control and Data Acquisition (SCADA) system, to a 24/7/365 manned control center. If an alarm were to occur, a maintenance person could be dispatched to investigate. Further, as noted in response to question two, routine substation inspections are performed to evaluate equipment oil levels and presence of oil weeps, seeps, or leaks.

4. Does Xcel have a procedure in place (such as a Safety Manual) to describe which substation jobs require a two-person operation versus single operator?

Though NSP's practices are in accordance with industry standards, NSP has no written procedures describing which substation jobs require multiple workers versus a single operator.

There are a number of employee classifications that perform work on our substations. Although most classifications work individually, the Company has an explicit "safety first" philosophy and all employees are aware that should they need assistance on the job, they can contact the dispatch function and a second employee will be sent to assist.

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5. In the last 5 years, has Xcel experienced unusual problems with its equipment, or had substandard equipment, at any of its substations in Minnesota? If so, what action has Xcel taken?

No. The Company does not believe it has experienced “unusual” problems with its substation equipment. As noted in the response to question two, substation equipment will sometimes fail unexpectedly, even if regular maintenance is provided consistent with good utility practices. The transmission system is designed and operated with redundancies to minimize the impact of failures of individual facilities or components.

Many of the substations on the NSP system have been in place for many years. The Transmission “system refresh” investments that have been discussed in prior rate cases and the current 2014 test year rate case are examples of investments the Company is making to replace aging substation and transmission line facilities. In addition, the ARCM program, introduced in 2013, provides for a systematic process to maintain the existing equipment that is most likely to need maintenance.

6. Any other issues deemed relevant to this inquiry.

We are not aware of any other issues deemed relevant to this inquiry.

CERTIFICATE OF SERVICE

I, Theresa Sarafolean, 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-14-131

Miscellaneous Electric Service List

Dated this 1st day of April 2014

/s/

Theresa Sarafolean

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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