



September 6, 2024

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

**RE: In the Matter of Xcel Energy’s Interactive Service Quality Map and Equity Analysis, Docket No. E002/M-24-27**

Dear Mr. Seuffert,

The City of Edina (“Edina”) appreciates the opportunity to comment on the matter of Xcel Energy’s (“Xcel” or “the Company”) Interactive Service Quality Map and Equity Analysis. Xcel Energy is the electric utility service provider for Edina and the Company’s ability to provide consistent, reliable electric service to our community in an important quality of life indicator.

The City of Edina is increasingly concerned about Xcel Energy’s ability to continue to provide consistent, reliable service. Edina has received numerous complaints from residents and businesses about Xcel Energy’s ability to provide reliable electric service in the past few months due to a high frequency of electric outages in Edina, lasting from hours to days for some community members. The increasing number of outages, including both short and prolonged outages, negatively impacts Edina community members. These impacts range from food loss to poor indoor air quality to extreme heat risks and public health impacts.

Edina respectfully submits these comments in response to the Commission’s notice of comment period issued July 26, 2024.

Service Quality

*1. In its April 1, 2024 Annual Report on Safety, Reliability, and Service Quality (SRSQ) Xcel Energy identified additional immediate steps it can take to expand outreach prior to disconnection that do not require Commission action. Are there other steps the Commission should take to address disparities in disconnections?*

Edina supports expanded outreach prior to disconnection. This expanded communication strategy, however, should not be solely geographically limited. Geographic limitations avoid engagement with customers at high-risk of disconnection living in areas that do not meet typical geographic indicators, such as concentrated poverty. Many of Edina’s energy-burdened residents who are at risk of disconnection reside in areas that would be excluded from Xcel’s expanded outreach if based solely on typical geographic indicators.



### Reliability

4. *Should the Commission direct Xcel Energy to file its proposed Enhanced Vegetation Management Proposal and Targeted Undergrounding Proposal as described in its April 1, 2024 Annual Report on SRSQ? If so, when and where should the Commission direct Xcel to file the proposals?*

Edina is generally supportive of an enhanced vegetation management and targeted undergrounding proposal. However, additional years of outage data collection would provide a more sufficient, data-driven case to determine if a proposal is needed, and to better understand the cause of and disparities in outages across the Company's Minnesota service territory. Additional analysis of the infrastructure costs and ratepayer impacts of undergrounding wires using Xcel Energy's existing undergrounding approach in Minnesota and other service territories like Colorado could provide a more precise estimate for potential costs tied to specific service regions than the filing's cited range of \$500,000 to \$5,000,000 per mile.

In addition, many cities like Edina have city-led initiatives to preserve and increase the tree canopy across public and private property as a tool to combat extreme heat. An enhanced proposal must incorporate and balance city-led initiatives to avoid public and private investment in canopy expansion in areas identified for vegetation management.

Edina acknowledges the potential high capital cost and timeline for accomplishing an undergrounding initiative. An enhanced undergrounding plan should incorporate municipal, county and State capital improvement plans to align major infrastructure investments with these efforts. A collaborative approach reduces costs and service disruptions for all parties.

Alignment with municipal plans can be accomplished through increased communication with city partners through the Company's existing relationships, such as the community relations team and Partners in Energy program.

### Map Modifications, Reporting, and Future Actions

6. *Are there any additional pieces of data to add to Xcel's Interactive Service Quality Map? When considering additional data points, please address:*

- a. *Whether the data is already collected and easily available in a format that could be added to the map*
- b. *If the data is something that is within Xcel Energy's control*
- c. *The purpose the additional data would serve*

Edina appreciates the availability of Xcel Energy's Interactive Service Quality Map. The data included in this map informs our Sustainability Division's work to reduce residents' energy burden and achieve our Climate Action Plan goals.

Additional data points to enhance Xcel Energy's Interactive Service Quality Map include:

- 1) **Municipal boundaries**, which are publicly available as shapefiles from the US Census Bureau. This data will allow users to easily identify data within their boundaries and allow for an easy way to navigate the data.
- 2) **Premise counts by census block**, which is within the Company's control and included in the data set attribute table but not represented as a map layer. This metric should be available as an initial column in the attribute table (currently one of the last columns in the table) and represented in the map pop-up. Most metrics are reported as a

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percentage of premises affected. Without easily knowing the count of premises within the census block, it is difficult to understand the number of premises affected and the scale of impact.

- 3) **Per premise energy costs**, which is within the Company's control. Per premise costs can be estimated using premise count, premise consumption, and premise cost data. This data will help users better understand disparities in per premise energy costs across the region.
- 4) **Outage durations**, which is within the Company's control. Understanding typical outage duration will help map users understand the average length of outages in addition to the CEMI 6 dataset.
- 5) **Extreme heat indicators** such as extreme heat days, daily average temperature in summer months, or average surface temperatures. This data is publicly available from various sources such as the MN Department of Health and NASA Earth Science Data Systems. This data would help understand how CELI 12, CEMI 6, LIHEAP participation, and CIP participation relates to extreme heat, leading to a better understanding of the public health and social impacts of outages and service disconnections.

Edina appreciates the Commission's consideration of our Comments as it relates to Docket No. E002/M-24-27.

Respectfully submitted,

A handwritten signature in blue ink that reads "Scott H. Neal".

/s/ Scott Neal  
City Manager  
City of Edina

A handwritten signature in blue ink that reads "Marisa Bayer".

/s/ Marisa Bayer  
Sustainability Manager  
City of Edina