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August 8, 2025

—Via Electronic Filing—

Mike Bull
Acting Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

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

Dear Mr. Bull:

Northern States Power Company, doing business as Xcel Energy, submits these Reply Comments in response to the initial comments in the above-referenced docket from the Department of Commerce (Department), joint comments from Environmental Law & Policy Center, Cooperative Energy Futures and Vote Solar, and comments from the Building Owners and Managers Association of Greater Minneapolis (BOMA).

Portions of Corrected Attachment O to these Reply Comments are marked "Not-Public" as they contain information the Company considers to be security information as defined by Minn. Stat. § 13.37(1)(a). Xcel Energy believes some information contained herein 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. The Company takes efforts to protect this information from public disclosure. Thus, Xcel Energy excises this information as protected data pursuant to Minn. Rule 7829.0500.

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

Sincerely,

/s/

NICHOLAS MARTIN
DIRECTOR, STRATEGIC OUTREACH AND ADVOCACY

Enclosures
cc: Service List

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STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

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

IN THE MATTER OF NORTHERN STATES
POWER COMPANY D/B/A XCEL
ENERGY'S 2024 ANNUAL SAFETY,
RELIABILITY, AND SERVICE QUALITY
REPORT

DOCKET NO. E002/M-25-27

REPLY COMMENTS

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits these Reply Comments in response to initial comments on the Company's Safety, Reliability and Service Quality Annual Report for 2024 (hereafter "SRSQ Annual Report") from the Department of Commerce (Department), Building Owners and Managers Association of Greater Minneapolis (BOMA), and Environmental Law & Policy Center, Cooperative Energy Futures and Vote Solar.

I. COMMENTS

A. DEPARTMENT OF COMMERCE

We organize our responses here using the same section numbering used in the Department's Public Comments, responding to each item on which the Department requests additional information.

1. *B.2 – Damages from Claims*

In its comments, the Department reviewed data on number of claims and total amount paid on claims in 2024, relative to the prior year and relative to the ten-year average of 2014-2023. The Department noted that number of claims in 2024 was not unusually high, but the average amount per claim increased significantly, relative to

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some prior years. The Department requested that the Company “provide additional information on its efforts to minimize damages from claims”¹

The Company’s Claims Department performs an investigation on all claims to determine liability. Once a full evaluation of Xcel Energy’s records and the information from the claimant is done, a determination is made. If Xcel Energy is liable for the damage, compensation will be provided to the customer in the form of the cost to make repairs or actual cash value. If, after a full evaluation of a claim, it does not meet the criteria for compensation, the claim is denied.

Depending on the claim, the Claims Department also follows up with business units to advise them of the claims originating from their area of work. The business units discuss improvement efforts with respective employees.

Recent year claim totals have been significantly lower as the pandemic created a timing lag for larger litigated claims. These larger claims are beginning to be settled as Minnesota’s six-year statute of limitations is approaching.

To minimize damages and costs associated with claims, Xcel Energy continues to focus on asset health and reliability to identify and rectify any defects on our distribution grid that could result in customer impacts. This includes our Priority Pole replacement program, with dedicated timelines to replace poles based on remaining strength. Also, our Vegetation Management department takes a proactive approach to identify and remedy vegetation obstructions within utility corridors by using LiDAR technology to target the most at-risk areas.

2. *C.5 – Major Service Interruptions*

“Major Service Interruption” is defined in Minn. R. 7826.0200, subpart 7 as “an interruption of service at the feeder level or above and affecting 500 or more customers for one or more hours.”² Minn. R. 7826.0700, subpart 1 requires utilities to

[P]romptly inform the commission's Consumer Affairs Office of any major service interruption. At that time, the utility shall provide the following information, to the extent known:

- A. the location and cause of the interruption;*
- B. the number of customers affected;*

¹ Public Comments of the Minnesota Department of Commerce *In the Matter of Xcel Energy’s 2024 Annual Safety, Reliability and Service Quality Standards Report and Proposed SAIFI, SAIDI, and CAIDI Reliability Standards for 2024*. Docket No. E002/M-25-27. (July 11, 2025) (Department Public Comments). Pages 6-7.

² [MN Rules 7826.0200 Subpart 7.](#)

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- C. the expected duration of the interruption; and*
- D. the utility's best estimate of when service will be restored, by geographical area.³*

The Company complies with Minn. R. 7826.0700 by sending to the CAO e-mail notifications of outages meeting the definition of Major Service Interruption.

In our SRSQ Annual Report, the Company reported that during 2024, there were 492 outages on Xcel Energy's system that met the definition of a Major Service Interruption, and of those, we failed to send to the CAO an e-mail notification for 118 of the interruptions. Specific details were provided in Attachment O to that report.⁴

In its comments, the Department requests that the Company:

Discuss potential process improvements to improve the Company's performance relative to having Control Center staff email the CAG [Xcel Energy's Customer Advocate Group] so that CAG can notify the Commission's Consumer Affairs Office.⁵

The Company convened the responsible departments to discuss potential process improvements on the reporting of Major Service Interruptions under Minn. R. 7826.0700. During those discussions, the team determined that of the 118 outages reported in our SRSQ Annual Report as having missed the required CAO notification, 51 were actually interruptions that occurred below the feeder level and thus did not meet the Minn. R. 7826.0200, subp. 7 definition of a Major Service Interruption requiring notification to CAO. The corrected number of Major Service Interruptions not reported to CAO is 66. We provide a Corrected Attachment O with these Reply Comments.

The number of Major Service Interruptions for which the CAO did not receive notification, while significantly lower than the number reported in our SRSQ Annual Report, was still higher than in prior years. We agree with the Department that this represents an area for potential process improvements. In addition, during the review process it was identified that some outages *not* meeting the definition of Major Service Interruption were reported to the CAO. Our goal is that all Major Service Interruptions, but only Major Service Interruptions, be reported to the CAO in compliance with Minn. R. 7826.0700. We plan to implement process improvements in

³ [MN Rules 7826.0700 Subpart 1.](#)

⁴ *Xcel Energy 2024 Annual Report and Petition Safety, Reliability and Service Quality Performance and Proposed Reliability Measures, Part II Reliability Performance Report for 2024.* Docket No. E002/M-25-27 (April 1, 2025.) (SRSQ Annual Report). Part II at page 66.

⁵ Department Public Comments at 15.

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the following three areas:

- A. *Operational Review.* The Company will review and as necessary refine our protocols for determining which outages meet the three criteria for Major Service Interruptions under Minn. R. 7826.0200, subpart 7, which require notification to CAO under Minn. R. 7826.0700, subpart 1. To be reportable to CAO, an outage must 1) be at the feeder level or above, 2) affect 500 or more customers, and 3) affect those customers for one or more hours.

- B. *Automation.* We believe automating the CAO email notification process will minimize human error as well as reduce workload for both the initial email reporting and the year-end gathering of data for the Annual SRSQ Report, Attachment O. The scope and scale of automation will need to be determined to ensure that the adopted automation techniques are practical and scalable.

- C. *Data Reconciliation.* The Company intends to implement a review process to ascertain that the CAO is being properly notified as required. The goal is to review the process throughout the year so as to be aware if additional changes to the process are necessary rather than waiting until annual reporting.

3. *D.1.2 – Vegetation Management*

In its comments, the Department provides a lengthy discussion of trends since 2018 in forecasted and actual miles of tree trimming on distribution and transmission lines, tree-coded customer interruptions, and the increase in labor costs for vegetation management as compared to the Consumer Price Index. The Department concludes that “a slowly increasing Vegetation Management budget and actuals that are increasing at an even lower annual rate when combined with a rapidly increasing labor rate would naturally result in a declining number of miles of distribution and transmission lines being trimmed (i.e. not staying on the five-year trimming cycle),” which the Department suggests correlates to an increasing number of vegetation-related outages.⁶

The Department requests that the Company:

Include an explanation of the Company’s rationale for: 1) not increasing the budget for the Vegetation Management Program beginning in 2022 when it was apparent that the program’s labor costs were increasing at a rate well above inflation; and 2) why Xcel allowed

⁶ Department Public Comments at 17-23.

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the number of miles trimmed under the program decline from 2019 to 2024.⁷

The Company is strategically targeting our vegetation management resources to projects that pose greater risk of tree-coded outages, where vegetation management can have the greatest benefit in reducing outage risk. For example, the Vegetation Management department has begun utilizing condition-based scheduling to ensure the most critical miles – those where vegetation management can provide the greatest reduction in tree-coded outages – are worked to benefit our customers. These circuits were mostly in our urban core areas and have a higher-level effort to complete vegetation management activities. Condition-based scheduling uses satellite imagery and artificial intelligence analytics versus a traditional time-based scheduling model. Condition-based scheduling better ensures that available resources are assigned to the projects with the highest risk and bring the greatest benefit back to our customers.

The Department is correct that there have been reductions in completed miles of tree trimming in some years. Their Figure 10a shows that miles of distribution lines trimmed increased from 2018 to 2019, declined from 2019 to 2020, grew again in 2020-2022 and declined in 2022-2024. Miles of transmission line trimmed stayed roughly flat throughout this period.⁸ The mileage reductions in 2020 were largely driven by the business impacts of the COVID-19 pandemic. In 2021 and 2022, the Company was able to increase miles treated, but continued to face challenges of availability of contract resources.

In 2022 the Company initiated a Request for Proposal for new contracts for vegetation management services starting in 2023. Through these new contracts, labor costs were adjusted to current market value. This increase in labor costs partially explains the reduction in miles of distribution line trimmed in 2023-2024. Additionally, in the fourth quarter of 2022 the Company updated its Vegetation Management Standards. One of the updates for distribution primary voltages was to more clearly define a vegetation clearance at time of pruning to a distance of at least six feet; previously, the vegetation clearance requirement had been determined based on species growth rates and other factors. Defining the 6-foot minimum clearance has improved outage risk reduction, but also increased the level of effort in completing vegetation management activities. These two factors – updating labor costs to reflect the current market when entering into new vegetation management contracts, and defining a uniform 6-foot vegetation clearance – together help explain the increase in loaded labor costs shown in the Department’s Figure 11c.⁹

⁷ Department Public Comments at 23.

⁸ Department Public Comments at 19.

⁹ Department Public Comments at 22.

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The Company believes our efforts to strategically target resources and improve our effectiveness – for example, through condition-based scheduling and establishing uniform vegetation clearances – will ultimately translate into greater customer benefit. These changes target limited resources to the areas where the risk of tree-coded customer interruptions is highest, and the reduction in that risk is higher per dollar spent on vegetation management.

Finally, we note that the Company proposes an increased budget for vegetation management in 2025-2026.¹⁰ In his testimony in the Company’s current multi-year rate plan application, Distribution witness Marty Mensen discusses how the budget increase will help cover increased contractor costs, make up for delayed work from prior years, and how the Company will continue to control costs through new technology and analytics, economies of scale, and performance-based negotiations with our tree-trimming contractors.

4. *D.2.4.9 – Reliability Indices by Customer Class*

In its comments, the Department requests that the Company “provide the analysis underlying the performance and reliability factors by customer class included in Table 14B.”¹¹

The Company discussed in our SRSQ Annual Report causes for differences in SAIDI, SAIFI, and CAIDI by customer class. We noted that some of these differences are likely attributable to less vegetation in industrial and commercial areas than in residential areas, shorter feeders due to higher load density resulting in less exposure to the environment, and a higher percentage of customers with underground service. We also noted our intention to continue researching these differences in reliability results between customer classes and report on any insights gained in future SRSQ reports.¹²

To enhance the narrative originally provided alongside Table 14B, the Company offers the following chart to better illustrate the generalizations discussed. This chart presents SAIDI minutes segmented by customer class—residential, commercial, and industrial—across two outage level tiers:

¹⁰ Direct Testimony of Marty D. Mensen *In the Matter of the Application of Xcel Energy for Authority to Increase Rates for Electric Service in Minnesota*. Docket No. E002/GR-24-320. November 1, 2024. Pages 153-154.

¹¹ Department Public Comments at 28.

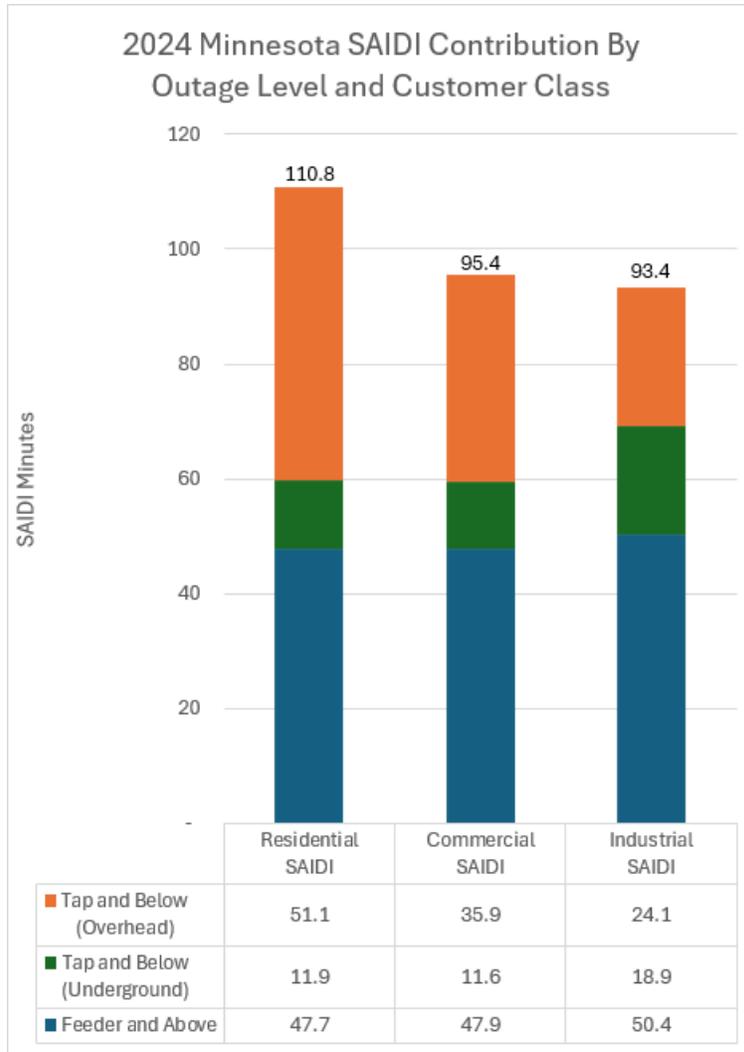
¹² SRSQ Annual Report, Part II at page 40.

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- Tier 1: Feeder level and above, extending to the Transmission system
- Tier 2: Overhead and Underground Tap level and below, down to the service wire

The chart demonstrates that commercial and industrial customers generally experience fewer SAIDI minutes at the tap level and below, indicating reduced overhead exposure compared to residential customers. This distinction supports the Company’s observations in the SRSQ Annual Report regarding infrastructure configuration and customer class exposure to localized outages.

Figure 1
SAIDI Minutes Segmented by Customer Class



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5. *E.3 – Service Extension Requests*

In its comments, the Department reviews the data provided by the Company on service extension request response times – specifically, the requirement in Minn. Rule 7826.1600, subpart B to provide “the number of customers requesting services to a location previously serviced by the utility, but not served at the time of the request” – which the Company provided in Tables 2C and 2D of our SRSQ Annual Report.¹³

The Department requests that the Company:

Given that the Department identified this change shortly before submitting its comments, the Department requests Xcel, in reply comments, confirm or correct the Department’s interpretation of the information provided in the Petition in Tables 2C and 2D in its reply comments.¹⁴

The Company confirms the Department’s interpretation of the information provided in Tables 2C and 2D of the SRSQ Annual Report. For subpart B of Rule 7826.1600, the Company’s previous SRSQ Annual Reports indicated the number of customers requesting service to existing locations both connected and disconnected. The SRSQ Annual Report indicates the number of customers requesting service to existing disconnected locations, to be more consistent with the rule.

6. *F.5.2.7 – Texting Capabilities for Customer Contact*

In its comments, the Department requests that the Company “Provide an update on the plan and timeline for implementing texting capabilities for reconnection and customer contact.”¹⁵

The Company is continuing to improve its texting platform for one-way (outgoing) communications. We currently use texting to communicate some messaging to customers. Plans for two-way texting to complete a reconnection have been necessarily put on hold as we shift limited resources to the process for communicating with customers who are to be reconnected in an extreme heat or Air Quality Index (AQI) event. The Commission ordered the Company to put that process in place by May 1, 2026, significantly ahead of our proposed schedule, which necessitates re-allocating staff time and resources from less urgent priorities.

¹³ SRSQ Annual Report, Part I at page 10.

¹⁴ Department Public Comments at 38.

¹⁵ Department Public Comments at 54-55.

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7. *F.5.2.8 – Direct Link to Submit Medical Form*

In our SRSQ Annual Report, the Company explained that our current website platform does not provide an option to “direct submit” the Medically Necessary Equipment & Emergency Certification form.¹⁶ In its comments, the Department requests that the Company:

Expand on its explanation about the complexities of direct submission of its Medically Necessary Equipment & Emergency Certification form. Specifically, is the Company proposing that it simply will not or cannot add a direct link currently and is requesting a change to this reporting requirement? In the alternative, is there a cost-effective alternative for a direct link to its website?¹⁷

The Company understands that the Department had requested an “interactive” medical form that customers could fill out and submit directly to our Personal Accounts Department. However, the customer themselves cannot complete the Medically Necessary Equipment & Emergency Certification form; this form must be approved and signed by a medical professional (Physician, Physician Assistant or Nurse Practitioner). In addition, most medical offices continue to favor fax over online processes for HIPAA reasons.

Therefore, the Company has created a link on our website for customers to download the form to provide to their medical professional, and an option for the medical professional to return the completed form via e-mail or fax. The Company’s Personal Accounts department also facilitates this process by faxing these forms to the medical professional’s office when requested by a customer. We would still need to rely on the medical professional’s office to approve and send the form back to our office once they have seen their patient (our customer of record). We are awaiting an update to our website platform that may make online form submission possible in the future, but the form will still need to be completed on the customer’s behalf by a medical professional.

8. *G.6 – Final Contact for Remote Disconnection*

Order Point 19 of the Commission’s January 13, 2025 Order in Docket No. E-002/M-24-27 “increases the existing threshold of final contact for disconnection by requiring Xcel to use two methods of electronic communication, including either text

¹⁶ SRSQ Annual Report, Part I at page 25. The form is available at [Medically Necessary Equipment & Emergency Certification Form.pdf](#).

¹⁷ Department Public Comments at 55.

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message or email in addition to voicemail where the Company has received customer consent to do so.”¹⁸ The Company indicated in our SRSQ Annual Report that we will begin providing this additional point of contact in April 2025.¹⁹

In its comments, the Department requests that the Company “provide an update on the status of adding the additional electronic, final contact method.”²⁰

Additional electronic, final contact method has been implemented and is currently in use. The Company uses text messaging or e-mail notification if the customer has given us consent to do so.

9. *G.7 – Affordability Program Outreach*

Order Point 21 of the Commission’s January 13, 2025 Order in Docket No. E-002/M-24-27 requires the Company to “perform additional outreach throughout its service territory with the goal of increasing participation in affordability programs that reduce bad debt.”²¹ The Company reported in our SRSQ Annual Report that we conduct outreach on an ongoing basis, both on Low Income Home Energy Assistance Program (LIHEAP) funded assistance and on the Company’s own affordability programs. In 2024, the Personal Accounts organization that manages our energy assistance and affordability programs completed 34 outreach campaigns, which included automated dials, emails, manual dials, mailers, bill inserts, social media, and in-person events.²²

In its comments, the Department requests that the Company:

*Compare the number of outreach campaigns completed in 2024 to the number of outreach campaigns completed in prior years. The Department also requests Xcel, in reply comments, summarize any lessons learned from the outreach campaigns it completed in 2024 (i.e. which mode was most effective; what were the outcomes of the campaigns; was there an increase in energy assistance enrollments following the campaigns; etc.).*²³

The 34 campaigns completed in 2024 represents the second highest to date in Minnesota, falling short only of the number in 2023. The decrease relative to 2023 is

¹⁸ January 13, 2025 ORDER *In the Matter of Xcel Energy’s 2023 Annual Safety, Reliability and Service Quality Report*. Docket No. E-002/M-24-27. (January 13 Order). Order Point 19.

¹⁹ SRSQ Annual Report, Part III at page 93.

²⁰ Department Public Comments at 59.

²¹ January 13 Order, Order Point 21.

²² SRSQ Annual Report, Part III at page 93.

²³ Department Public Comments at 59-60.

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explained primarily by the uncertainty around LIHEAP funding in the first quarter of 2024, when the Company delayed some outreach pending greater clarity so as not to create customer confusion. Instead the Company’s Personal Accounts organization adapted and began creating smaller, more tailored outreach to customers facing a threat of disconnection, as well as working with Hennepin County on completing a “personal touch” or “concierge”-style campaign to applicants who had had their application for energy assistance denied due to missing information and/or income eligibility.

Both the Company and Hennepin County staff found this approach to be highly successful. A personal touch or “concierge” approach has historically had the highest adoption rates of all campaigns. In addition, focusing on customers who have at least attempted the application process means they were already engaged, allowing the Company to focus on helping them successfully complete the process. Our analysis shows that customers who are contacted through three campaigns, including at least two different methods, are most likely to complete an energy assistance application. Adoption rates for outreach campaigns in general are between 4 and 6 percent, but some “concierge” style campaigns achieve over 10 percent adoption.

10. G.11 – Customer Outreach on Medical Protections

Order Point 25 of the Commission’s January 13, 2025 Order in Docket No. E-002/M-24-27 requires the Company to “conduct additional outreach and provide customers with information about how to request medical protections if they are particularly vulnerable to poor air quality.”²⁴ The Company reported in our SRSQ Annual Report various measures we are taking in this regard: including medical certification education information in all energy assistance campaigns, training customer service representatives on available protections and assistance so they can provide this information to customers as they call in for assistance, and providing medical protection information to customers at in-person events and through our dedicated team in the Personal Accounts department. This includes information about medical protections that are available for customers who are sensitive to poor air quality or extreme heat.²⁵

In its comments, the Department expresses a concern that providing information on medical protections when a customer calls is reactive; they would like the Company to speak to proactive measures to notify customers of such protections. The Department

²⁴ January 13 Order, Order Point 25.

²⁵ SRSQ Annual Report, Part III at page 102.

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points to its recommendation, in response to the Commission’s April 7, 2025 Notice on Heat and AQI events, that the Company should make a 60-day compliance filing detailing its communication and outreach strategies to inform customers of extreme heat and air quality protections, including the availability and protections of its Medically Necessary Equipment & Emergency Certification Form. The Department also requests that the Company in these Reply Comments “propose a plan to proactively provide information regarding medical protections (before a customer may be facing disconnection or calling for help).”²⁶

We answer this request in two parts: first, the Company’s efforts to inform all customers of medical protections, whether or not they are disconnected or facing disconnection; second, the recently approved plans to implement reconnection and suspension of disconnection during certain extreme heat and AQI events.

On the first, the Company agrees on the value of proactively informing all customers of medical protections available to them. This is currently taking place in all of our outreach efforts for customers who are in danger of disconnection, as well as an annual bill insert to all residential customers advising on the medical protections and affordability programs. In addition to these outreach efforts, the Company is proposing additional outreach to medical offices to provide the Medically Necessary Equipment & Emergency Certification Form and additional education on protections available, as well as in-person events to be scheduled in the communities we serve to provide education on energy assistance, the Company’s own affordability programs, and medical protections.

On the second, the Commission on July 17, 2025 considered the Company’s proposal to reconnect currently disconnected customers during heat advisories and extreme heat warnings issued by the National Weather Service, and both suspend disconnections and reconnect currently disconnected customers when the AQI issued by the Minnesota Pollution Control Agency is at or above 151 (Unhealthy). The Commission’s July 25, 2025 Order approved those plans and ordered the Company to implement them by May 1, 2026.²⁷ As a result, beginning on that date all customers – whether or not they are particularly vulnerable, and whether or not they have completed the Medically Necessary Equipment & Emergency Certification Form – will be protected from disconnection and, if disconnected, will be temporarily reconnected for the duration of an extreme heat or AQI ≥ 151 event. While the Commission did not include in its Order the Department’s recommended 60-day

²⁶ Department Public Comments at 62.

²⁷ July 25, 2025 ORDER *In the Matter of Northern States Power Co. d/b/a Xcel Energy’s 2024 Annual Safety, Reliability, and Service Quality Report*. Docket No. E-002/M-25-27.

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compliance filing, it did require the Company to “post on its website an overview of extreme heat and air quality protections and the steps customers must take to secure reconnection of service.”²⁸ So the Company will be implementing this notification of the new protections.

The Company agrees that both types of customer outreach – on medical protections available at all times, and on the new heat/AQI event protections available starting May 2026 – are important. We will continue proactive efforts to make sure customers are aware of these protections.

11. G.17 – Increasing pre-weatherization, weatherization and energy efficiency in areas of high energy burden

Order Point 31 of the Commission’s January 13, 2025 Order in Docket No. E-002/M-24-27 requires the Company to evaluate implementing several policies. One of these, Order Point 31.b, requires “A proposal to increase the number of customers receiving pre-weatherization, weatherization, and energy efficiency improvements, including deep retrofits to create greater energy savings, in areas within the Company’s service territory with high energy burden. The proposal should include year over year targets designed to increase the number of people receiving energy efficiency measures.”²⁹

In response, the Company provided a summary of the significant expansion since 2021 in Income Qualified programs within the Company’s Energy Conservation & Optimization (ECO) portfolio. Those programs include Affordable Efficient New Home Construction, the Home Energy Savings Program, Low Income Home Energy Squad, Low Income Multifamily Building Efficiency, and Workforce Development. Spending has increased approximately fivefold from 2021 to 2024, with expanded outreach and relaxed requirements to encourage participation. The Company reports on the Income Qualified programs in our ECO annual Status Reports, with the most recent one filed April 1, 2025 in Docket No. E,G002/CIP-23-92. We proposed that the anticipated and actual Income Qualified residential customer participation levels for each program, and the planned and actual Income Qualified spending and energy savings for each program, are in effect “year over year targets” per the language of Order Point 31.b.³⁰

²⁸ July 25, 2025 Order, Order Point 11.

²⁹ January 13 Order, Order Point 31.b.

³⁰ SRSQ Annual Report, Part III at pages 107-110.

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In its comments, the Department requests that the Company:

File “a proposal to increase the number of customers receiving pre-weatherization, weatherization, and energy efficiency improvements, including deep retrofits to create greater energy savings, in areas within the Company’s service territory with high energy burden,” as originally ordered at Order Point 31.b.³¹

As noted in our SRSQ Annual Report, the Company believes the most appropriate place to propose plans for increased adoption of ECO programs is in the Triennial plans filed in the ECO docket. There, the Department has authority to consider proposals the Company might make to further expand participation in ECO Income Qualified programs, including those that provide pre-weatherization, weatherization, and energy efficiency improvements. Xcel Energy will provide a proposal in our next ECO Triennial Plan, to be filed June 1, 2026, for the Department’s consideration. Importantly, this proposal will be informed by the discussions with the Department and other stakeholders in the Department’s ECO Income-Eligible Working Group.³²

We do not suggest ECO is the only place where the Company can provide support for pre-weatherization, weatherization, and energy efficiency improvements in areas of high energy burden. We have also proposed to do this in the Company’s Natural Gas Innovation Plan, via a proposed pilot for strategic electrification, building envelope, energy efficiency and/or deep weatherization for low-income customers.³³ And we are in active conversations with our Environmental Justice Accountability Board (EJAB) on lessons learned, best practices, and additional recommendations from EJAB on this same topic.³⁴

The Company does not believe there is more to address about these programs in Order Point 31.b of the SRSQ docket.

12. *G.17 – Hot Weather Rule*

Also included in Order Point 31 of the Commission’s January 13, 2025 Order in Docket No. E-002/M-24-27 was a requirement to evaluate “a more robust hot-weather rule to prevent disconnections in months with the highest cooling energy

³¹ Department Public Comments at 66.

³² See <https://ecohealthstrat.notion.site/eco-income-eligible-working-group>.

³³ Northern States Power Company, doing business as Xcel Energy. COMPLIANCE - ORDER POINT 18.B. NATURAL GAS INNOVATION ACT PLAN. Docket Nos. G002/M-23-518 and G999/CI-21-566. July 15, 2025.

³⁴ See EJAB Meeting Minutes filed in Docket Nos. E002/M-22-266 and E002/RP-19-368. *In the Matter of Efforts to Advance Workforce Diversity, Inclusive Participation, and Equitable Access to Utility Services.*

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burden.”³⁵ The Company addressed this requirement in our SRSQ Annual Report, discussing the potential impacts if disconnections were to be suspended in July and August in addition to the current Cold Weather Rule suspensions.³⁶

In its comments, the Department requests that the Company:

*Explain its concern regarding the impact the additional months of disconnection suspension may have on the increased need for energy assistance funding and the potential for more customers to experience hardship.*³⁷

During the 18-month emergency moratorium on disconnections during the COVID-19 pandemic, we learned that customers were less likely to engage with the Company to make efforts to pay down arrears balances. This also reduced the Company’s opportunities to connect such customers to energy assistance and the Company’s affordability programs. As a result, arrears balances grew by 50 percent over pre-pandemic levels. This resulted not only in a significant increase in bad debt, but also led many customers to accrue past-due balances that were very difficult for them to pay off. This has created a long-term challenge that we discussed in our SRSQ Annual Report, where we noted that “in 2024, the results of past and current economic challenges, coupled with higher arrears balances and a continued return to more normal credit activity, led to a higher number of customers experiencing a disconnection or struggling to enter into a payment arrangement.”³⁸ The current higher levels of involuntary disconnections reflect, to some degree, the ongoing challenges some customers face in paying off a high arrears balance accrued during a long disconnection moratorium.

While disconnection is always a last resort, the Company anticipates that with additional suspension of disconnections in July and August – in essence, limiting credit disconnections to only May, June and September – a similar outcome to the COVID-19 moratorium could result. Customers may end up with high past due balances, leading to increased need for energy assistance – at a time when the federal LIHEAP program is facing potential reductions in appropriations, impacting availability of funds. In addition, eliminating the prospect of disconnection in all but three months of the year could mean that customers in effect stop responding to the Company, eliminating one of the primary opportunities the Company has to make them aware of energy assistance and the Company’s affordability programs.

³⁵ January 13 Order, Order Point 31.c.

³⁶ SRSQ Annual Report, Part III at page 110.

³⁷ Department Public Comments at 67.

³⁸ SRSQ Annual Report, Part I at page 8.

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13. *G.21 – Employee training on disparities*

Order Points 35 and 36 of the Commission’s January 13, 2025 Order in Docket No. E-002/M-24-27 require the Company to “inform affected personnel of racial disparities in electric service” and “file a compliance report with its annual safety, reliability, and service quality filing on which employees received the training and what information was provided.”³⁹ In response, the Company discussed in our SRSQ Annual Report the disparities in long outages (CELI-12) and disconnections identified in the Pradhan/Chan and TRC studies filed in Docket No. E002/M-24-27. We discussed how the Company plans to develop a tailored training, offered to employees whose work concerns outage management and restoration, and who interact with customers to offer payment arrangements, informing them of the disparities and the Company’s ongoing work to identify potential solutions to reduce disparities.⁴⁰

In its comments, the Department requests that the Company:

*Provide an update on the progress and timeline of its goal of developing and administering a new training that focuses on overcoming unintended bias in customer interactions during service interruptions.*⁴¹

The Company views these two Order Points as linked to Order Point 46, under which the Company will hire an independent third-party evaluator to examine the same disparities (see section 16 below). We believe they are linked because the findings of the third-party evaluator will help understand the causes of the disparities, potential solutions, the content of training, and which employees should receive it. We will work with the selected third-party evaluator, as well as other stakeholders, to develop training that focuses on the identified disparities in CELI-12 and disconnections and overcoming unintended bias in customer interactions. We believe this training can build on the more general “Microaggressions and Unconscious Bias” training, offered to all Xcel Energy employees, on inadvertent racial and other biases and how to avoid them – but can also go further, focusing on the specific disparities identified in the two studies. As required by Order Point 36, the Company will report on these efforts with our next SRSQ Annual Report in April 2027.

14. *G.23 – Additions to Interactive Service Quality Map*

Order Points 39, 40 and 41 of the Commission’s January 13, 2025 Order in Docket

³⁹ January 13 Order, Order Points 35 and 36.

⁴⁰ SRSQ Annual Report, Part III at page 113.

⁴¹ Department Public Comments at 69.

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No. E-002/M-24-27 require the Company to add eight new data layers to its Minnesota electric interactive service quality map.⁴² The Company discussed how we have added six of those eight data layers, which are now available on the map at <https://experience.arcgis.com/experience/928c8b0e3cd3475fbb7c23b355c2df37>.

In its comments, the Department requests that the Company:

Provide an update on its progress updating the map to align with the EOY 2024 vintage. The Department also requests Xcel, in reply comments, provide an update on its progress to add the “average age [of arrears] for disconnected premises” and “average amount of arrears for disconnected premises” to its map.⁴³

Regarding updating all map data layers to End of Year (EOY) 2024 vintage, this remains in progress at this time, but the Company estimates can be completed by the end of September 2025. These are multiple large datasets, with different rates of change over time as described in our SRSQ Annual Report. Aligning all of them to EOY 2024 is requiring significant re-work to the map.

Regarding the data layer discussed in Order Point 41, “average amount of arrears for disconnected premises,” the Company has now compiled data for all premises in disconnected status as of EOY 2024, showing the amount of arrears as of that time by customer and premise number. We can calculate a CBG-level average – the sum of arrears for all disconnected premises in the CBG, divided by number of disconnected premises in that CBG – and add this data to the map. We expect to be able to add this data by August 15, 2025.

Regarding the data layer discussed in Order Point 39, “average age of arrears for disconnected premises,” the Company has further investigated the available data and concluded that this data layer is not feasible to add to the map at this time. This is for several reasons. First, debt is tracked at the account level, not premise level. This means an individual customer could have arrears of different ages that have followed them from one premise to another as they moved, and/or combined arrears on their account associated with more than one premise in more than one CBG. This makes it difficult to assign those arrears to a single CBG and then calculate an average age of arrears by CBG. Second, the Company’s data management systems do not store data on age of arrears at the time of disconnection back to EOY 2024, making it difficult to assemble this data at a vintage consistent with other data layers on the map. Third, under the Company’s credit timelines, a residential customer will not face

⁴² January 13 Order, Order Points 39, 40 and 41.

⁴³ Department Public Comments at 70-71.

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disconnection for many weeks after beginning to accrue a past-due balance, and will not receive a disconnection notice until they have arrears 60+ days old. Our standard process involves many weeks of reminders and efforts to set up a payment arrangement before the customer receives a final disconnection notice or faces actual disconnection. This means customers disconnected will only include those whose arrears have already aged 60+ days, which would distort the average age of arrears. Considering all these challenges, the Company does not believe it will be feasible or useful to attempt to map age of arrears by CBG.

15. *G.25 – Analysis Period for CELI-12 Trends*

Order Points 38 and 44 of the Commission’s January 13, 2025 Order in Docket No. E-002/M-24-27 require the Company to “perform additional analysis as outlined in decision options below prior to developing a proposal for targeted undergrounding or enhanced vegetation management” and “develop its data collected on causes of CELI-12 outages to inform which causes predominantly affect CBGs currently showing increased CELI-12. Xcel must then analyze whether the primary causes emerging in census block groups with increased CELI-12 are caused by overhead assets.”⁴⁴

The Company discussed these analyses in our SRSQ Annual Report,⁴⁵ and plans to provide additional analysis of targeted undergrounding in our Integrated Distribution Plan filed November 1, 2025.

In its comments, the Department requests that the Company:

*Discuss what a sufficiently long analysis period may be (if not the three-year period utilized in the TRC study) including the availability of the data needed to evaluate CELI-12 trends in the affected CBGs across the longer analysis period.*⁴⁶

The Company appreciates the Department’s request for clarification regarding the appropriate analysis period for evaluating CELI-12 trends in the affected Census Block Groups (CBGs). A longer analysis period would provide a more robust basis for assessing reliability trends, particularly given the significant influence of severe weather events on CELI-12 outcomes.

We recommend extending the analysis period from the three-year rolling average,

⁴⁴ January 13 Order, Order Points 38 and 44.

⁴⁵ SRSQ Annual Report, Part III at pages 116-125.

⁴⁶ Department Public Comments at 75.

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used by TRC in its study and also currently used for all data layers in the Interactive Service Quality map, to a 10-year period, which offers a more statistically meaningful baseline. A 10-year period will not be immune to influences from geographically concentrated impacts of extreme weather events. However, it represents a balance to also reflect the current performance of electric distribution system, which can be influenced by upgrades and configuration changes in recent history. This proposed longer timeframe allows for a more comprehensive evaluation of reliability performance by smoothing out short-term anomalies and better capturing the variability introduced by extreme weather events.

This recommendation is supported by a review of NOAA’s Storm Events Database,⁴⁷ which indicates that over the past 50 years, only four other events in Hennepin and Ramsey counties matched the severity of the August 14, 2020 storm. That storm was characterized by wind gusts exceeding 50 knots, combined with hail of one inch or greater, and confirmed tornado activity.

The Company has access to the necessary reliability data covering the past decade, including detailed outage records for the affected CBGs.

16. *G.27 – Third-Party Evaluation of Disparities*

Order Point 46 of the Commission’s January 13, 2025 Order in Docket No. E-002/M-24-27 requires the Company to “hire an independent third-party evaluator with expertise in evaluating racial disparities to conduct a one-year study that will evaluate Xcel’s practices and policies related to capital investment planning, outage restoration practices, and shutoff practices to better understand the causes of these discrepancies in shutoff rates and service reliability. Xcel must engage interested stakeholders to participate and collaborate with the independent third-party evaluator.”⁴⁸

In its comments, the Department looks forward to continued stakeholder collaboration on this issue, but concludes that “Xcel has not yet complied with all the aspects of this order point as the collaboration is ongoing.”⁴⁹

The Company agrees that this Order Point remains in progress. We can here report that the Company issued a Request for Proposals (RFP), which is now closed, and has received proposals from several prospective evaluators. We have established a five-

⁴⁷ See [Storm Events Database | National Centers for Environmental Information](#).

⁴⁸ January 13 Order, Order Point 46.

⁴⁹ Department Public Comments at 78.

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person Review Committee consisting of Xcel Energy staff who are subject matter experts in CELI-12 and disconnections, and members of our Environmental Justice Accountability Board (EJAB). The reviewers are presently scoring the proposals. We expect to create a short-list and conduct evaluator interviews later in August 2025, leading to selection of an Evaluator and contract execution. Once the Evaluator has reached preliminary findings, we expect to engage interested stakeholders. Our current plan would have the Evaluator finalizing its report in time for inclusion with our 2025 Safety, Reliability and Service Quality annual report on April 1, 2026.

17. *Additional Clarifications*

In this section, we provide clarifications to our SRSQ Annual Report on two items on which the Department commented but did not specifically request additional information.

a. Field Orders

In its reply comments, the Department notes that:

In 2024, Xcel reported the total number of field order was 1,838 and the 2024 total was significantly less than both the 2022 and 2023 numbers for this same metric (9,379 and 7,824 respectively). The average response time for those orders increased from 3.54 days in 2022 to 7.05 days in 2023 and 8.7 days in 2024.⁵⁰

The Company clarifies that the values provided for 2022 and 2023 are total electric and gas field orders, while the 1,838 reported for 2024 represents only electric field orders. The reduction in the volume of electric field orders in 2024 compared to recent years can be attributed to the deployment of new AMI meters.

b. State of Hiring Market

In its reply comments, the Department notes that the “Xcel did not reply to the Department’s question regarding the state of the hiring market but did identify the following changes it had made in response.”⁵¹

To add to our response to the Department’s Information Request No. 15 in this docket, the Company has experienced challenges in filling positions that stem from a combination of labor market constraints and evolving position complexity. On the

⁵⁰ Department Public Comments at 46.

⁵¹ Department Public Comments at 41.

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topic of labor market constraints, the Company has seen an ongoing and increased demand for remote and hybrid roles, as well as a shrinking pool of applicants seeking a front-line customer service position. Evolving position complexity surrounds the nature of expectations for front-line employees to adhere to performance metrics, protect customer data, align to evolving processes, while remaining on top of navigating rate structures or service offerings for all states the Company serves.

B. ENVIRONMENTAL LAW & POLICY CENTER, COOPERATIVE ENERGY FUTURES AND VOTE SOLAR

Xcel Energy thanks the Environmental Law & Policy Center, Cooperative Energy Futures and Vote Solar (together, ELPC/CEF/VS) for their comments.

1. *Targeted Undergrounding*

Section A of the ELPC/CEF/VS comments addresses targeted undergrounding as a potential solution to reduce disparities in CELI-12 identified in the Pradhan/Chan and TRC studies filed in Docket No. E002/M-24-27. The Company discussed targeted undergrounding in our SRSQ Annual Report, but also noted that we expect to provide further detail in our upcoming Integrated Distribution Plan (IDP) filed November 1, 2025.⁵²

ELPC/CEF/VS agree that the upcoming IDP provides an appropriate forum to evaluate targeted undergrounding in the broader context of the Company's distribution plans and investments. ELPC/CEF/VS request that the Company provide, in that IDP filing, additional refinement if possible of our targeted undergrounding cost estimates, including any ongoing O&M costs associated with undergrounded assets. They also express concerns around impacts of construction in the identified CBGs, mitigation and communication with the impacted communities.⁵³ The Company agrees the IDP is the appropriate forum for robust discussion of these plans and looks forward to further discussions with ELPC/CEF/VS and other stakeholders in that docket.

⁵² SRSQ Annual Report, Part III at 116-125.

⁵³ Environmental Law & Policy Center, Cooperative Energy Futures, and Vote Solar. Comments *In the Matter of Xcel Energy's 2024 Annual Safety, Reliability and Service Quality Standards Report and Proposed SAIFI, SAIDI, and CAIDI Reliability Standards for 2024*. Docket No. E002/M-25-27. (July 11, 2025) (ELPC/CEF/VS Comments). Pages 2-3.

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2. *Third-Party Evaluation of Disparities*

Section B of the ELPC/CEF/VS comment letter addresses the Company’s plans, under Order Point 46 of the Commission’s January 13, 2025 Order in Docket No. E002/M-24-27, to hire an independent third-party evaluator with expertise in evaluating racial disparities to evaluate the Company’s capital investment planning, outage restoration practices, and shutoff practices to better understand the causes of the identified disparities. We provide an update on those efforts in section I.A.16 above. ELPC/CEF/VS request to be included in any outreach when the Company “engage[s] interested stakeholders to participate and collaborate with the independent third-party evaluator.”⁵⁴ The Company will include ELPC, CEF, and VS in our outreach, which we expect to take place in late 2025 to early 2026.

3. *Interactive Service Quality Map*

ELPC/CEF/VS note that two data layers – average age of arrears and average amount of arrears for disconnected premises – are not yet available on the Minnesota electric interactive service quality map, and that the map data does not appear to be downloadable to facilitate further stakeholder analysis.⁵⁵

Please see section I.A.14 for a discussion on these two data layers. All map data is downloadable by clicking on the small up-arrow at the bottom of the screen. In the data table that expands from the bottom, a map user can click on the top right button, labeled “Actions,” then select “Export” and choose among six different file types to export the map data. A user can also use the “Set filter” option under “Actions” to explore and export data only on certain CBGs or variables of interest to the user.

⁵⁴ ELPC/CEF/VS Comments at 4-5.

⁵⁵ ELPC/CEF/VS Comments at 5-6.

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**C. BUILDING OWNERS AND MANAGERS ASSOCIATION OF GREATER
MINNEAPOLIS (BOMA)**

BOMA raised concerns regarding customer billing issues with Xcel Energy earlier this year, and the Company has been working to address complaints and resolve issues for these customers. In July, Xcel Energy responded to a Department of Commerce Information Request regarding BOMA's complaint on behalf of its members. The Company's response to that Information Request is attached as Attachment A to these Reply Comments.

Dated: August 8, 2025

Northern States Power Company

	Feeder	Primary Event #	Begin Time	Completion Time	Duration Min.	Customers Out	Region	Email sent to CAO
[PROTECTED DATA BEGINS]								
JANUARY = 6 total qualifying event, 0 events with no email								
1		2522080	1/10/2024 18:31	1/10/2024 19:57	85	245	Maple Grove_MW	X
2		2522194	1/11/2024 8:44	1/11/2024 9:48	64	1,506	Northwest-St Cloud_NT	X
3		2522548	1/11/2024 21:24	1/12/2024 0:09	323	1,732	Northwest-St Cloud_NT	X
4		2523314	1/14/2024 4:49	1/14/2024 7:49	180	2,412	Newport_ME	X
5		2524683	1/14/2024 4:49	1/14/2024 7:21	152	1,632	Newport_ME	X
6		2525491	1/19/2024 18:26	1/19/2024 19:36	70	2,063	Newport_ME	X
FEBRUARY = 8 total qualifying events, 0 events with no email								
1		2530501	2/4/2024 14:14	2/4/2024 15:32	77	2,112	Mpls_Mtka_Plymouth_ MW	X
2		2530998	2/5/2024 12:32	2/5/2024 14:00	88	2,724	Minnetonka_MW	X
3		2531950	2/7/2024 23:35	2/8/2024 1:05	90	1,995	Minnetonka_MW	X
4		2536670	2/24/2024 8:30	2/24/2024 10:26	116	1,469	Faribault_Mankato_SE	X
5		2536766	2/24/2024 13:16	2/24/2024 13:26	10	1,469	Faribault_Mankato_SE	X
6		2536759	2/24/2024 12:41	2/24/2024 13:17	36	232	Mpls_Mtka_Plymouth_ MW	X
7		2536779	2/24/2024 12:41	2/24/2024 15:13	151	1,637	Mpls_Mtka_Plymouth_ MW	X
8		2534444	2/16/2024 3:35	2/16/2024 21:34	101-359	2438	Minnetonka_MW	X
MARCH = 6 total qualifying events, 0 events with no email								
1		2541085	3/6/2024 23:54	3/7/2024 1:10	76	663	Faribault_Mankato_SE	X
2		2542450	3/12/2024 7:06	3/12/2024 8:12	66	954	Maple Grove_MW	X
3		2544662	3/19/2024 14:49	3/19/2024 16:44	115	665	White Bear_ME	X
4		2546193	3/24/2024 15:36	3/24/2024 18:09	153	1,358	Minnetonka_MW	X
5		2546194	3/24/2024 15:36	3/24/2024 18:09	153	1,557	Minnetonka_MW	X
6		2546519	3/24/2024 22:05	3/24/2024 23:05	60	1,535	Edina_MW	X
APRIL = 12 total qualifying events, 4 events with no email								
1		2553989	4/8/2024 13:02	4/8/2024 13:45	42-369	1,206	St Paul_ME	X
2		2557643	4/15/2024 5:09	4/15/2024 7:02	113	1,257	Minnetonka_MW	X
3		2557953	4/5/2024 22:57	4/6/2024 0:28	91	828	Winona_SE	
4		2557960	4/5/2024 22:57	4/6/2024 0:28	91	1,032	Winona_SE	X
5		2557996	4/15/2024 13:55	4/15/2024 14:30	34-402	1,534	Maple Grove_MW	X
6		2558679	4/16/2024 11:39	4/16/2024 12:39	60	920	White Bear_ME	
7		2559383	4/16/2024 17:45	4/16/2024 19:24	99	2411	White Bear_ME	
8		2559386	4/16/2024 17:46	4/16/2024 19:05	79	2,166	White Bear_ME	X
9		2559888	4/16/2024 4:10	4/16/2024 19:13	182	799	White Bear_ME	
10		2565394	4/26/2024 9:34	4/26/2024 9:59	24-94	708	Maple Grove_MW	X
11		2566829	4/29/2024 20:29	4/29/2024 22:19	110	5,596	Maple Grove_MW	X
12		2567016	4/30/2024 4:03	4/30/2024 5:06	63	1398	St Paul_ME	X
MAY = 32 total qualifying events, 14 events with no email								
1		2567807	5/1/2024 9:47	5/1/2024 13:33	226	1,311	Northwest-St Cloud_NT	
2		2567808	5/1/2024 9:47	5/1/2024 12:55	188	1,988	Northwest-St Cloud_NT	X
3		2567809	5/1/2024 9:47	5/1/2024 11:55	129	890	Minnetonka_MW	X
4		2567810	5/1/2024 9:47	5/1/2024 12:10	143	1,564	Minnetonka_MW	X

	Feeder	Primary Event #	Begin Time	Completion Time	Duration Min.	Customers Out	Region	Email sent to CAO
5		2570106	5/4/2024 6:10	5/4/2024 7:24	74	1,599	Faribault_Mankato_SE	X
6		2570590	5/5/2024 10:27	5/5/2024 12:34	127	621	Faribault_Mankato_SE	X
7		2571625	5/7/2024 3:08	5/7/2024 6:05	177	1,306	Maple Grove_MW	X
8		2574993	5/11/2024 11:37		115	1,206	Northwest-St Cloud_NT	
9		2575426	5/12/2024 12:34	5/12/2024 15:18	163	882	St Paul_ME	X
10		2579224	5/16/2024 3:27	5/16/2024 17:42	135	2,624	St Paul_ME	
11		2580090	5/18/2024 6:07	5/18/2024 11:48	340	902	White Bear_ME	
12		2580269	5/18/2024 16:36	5/18/2024 18:09	92	4,116	Mpls_Mtka_Plymouth_ MW	
13		2581365	5/21/2024 1:25	5/21/2024 2:49	84	2,565	White Bear_ME	X
14		2581373	5/21/2024 1:40	5/21/2024 3:38	117	1,863	Mpls_Mtka_Plymouth_ MW	X
15		2581404	5/21/2024 3:10	5/21/2024 4:11	61	2,565	White Bear_ME	X
16		2581511	5/21/2024 6:45	5/21/2024 11:27	282	2,692	St Paul_ME	X
17		2582162	5/21/2024 11:48	5/21/2024 12:58	70	2,575	White Bear_ME	X
18		2582571	5/21/2024 16:51	5/21/2024 18:01	70	3,760	Edina_MW	X
19		2583211	5/21/2024 18:08	5/21/2024 19:34	86	1,007	Winona_SE	X
20		2583223	05/21/24 06:12	5/21/2024 19:08	55-119	2,768	Winona_SE	X
21		2584729	5/22/2024 0:30	5/22/2024 2:12	102	2,154	St Paul_ME	X
22		2585041	5/22/2024 5:17	5/22/2024 6:03	46	597	St Paul_ME	X
23		2587168	5/24/2024 8:13	5/24/2024 9:50	97	2,061	Mpls_Mtka_Plymouth_ MW	
24		2587974	5/24/2024 22:00	5/24/2024 23:23	83	1,613	Minnetonka_MW	
25		2589035	5/27/2024 16:37	5/27/2024 21:56	320	666	Northwest-St Cloud_NT	
26		2589705	5/28/2024 6:10	5/28/2024 7:11	61	2,114	Newport_ME	
27		2589711	5/28/2024 6:27	5/28/2024 7:32	65	7,641	Mpls_Mtka_Plymouth_ MW	
28		2590216	5/28/2024 15:24	5/28/2024 18:25	181	2,298	St Paul_ME	
29		2591766	5/30/2024 11:08	5/30/2024 12:24	75	774	White Bear_ME	
30		2592994	5/31/2024 19:28	5/31/2024 21:26	118	2,941	White Bear_ME	
31		2593077	05/31/24 09:28		165-169	996	Newport_ME	
32		2593231	5/31/2024 21:28	5/31/2024 22:43	75	1,952	Minnetonka_MW	X
JUNE = 49 total qualifying events, 26 events with no email								
1		2595152	6/3/2024 5:49	6/3/2024 6:50	60	2,042	Winona_SE	X
2		2595179	6/3/2024 6:28	6/3/2024 11:05	277	1743	St Paul_ME	X
3		2595622	6/3/2024 10:27	6/3/2024 12:25	117	649	Newport_ME	X
4		2596237	6/3/2024 20:22	6/4/2024 10:48	865	951	Minnetonka_MW	
5		2596495	6/4/2024 1:47	6/4/2024 10:14	506	951	Minnetonka_MW	
6		2597622	6/4/2024 19:04	6/4/2024 20:26	82	1,113	Edina_MW	X
7		2598974	6/5/2024 14:20	6/5/2024 18:44	263	2976	St Paul_ME	X
8		2599038	6/5/2024 15:01	6/5/2024 16:42	101	2,943	White Bear_ME	X
9		2599564	6/5/2024 16:47	6/5/2024 19:35	168	2,535	White Bear_ME	
10		2599944	6/5/2024 18:26	6/5/2024 19:43	76	1171	Faribault_Mankato_SE	X
11		2599986	6/5/2024 18:32		72	3079	White Bear_ME	X
12		2600551	6/5/2024 20:36	6/5/2024 21:45	68	1,934	Winona_SE	X
13		2600804	6/5/2024 20:36	6/5/2024 22:30	114	831	Winona_SE	X

	Feeder	Primary Event #	Begin Time	Completion Time	Duration Min.	Customers Out	Region	Email sent to CAO
14		2601067	6/6/2024 3:52	6/6/2024 13:19	567	1323	Winona_SE	X
15		2601720	6/6/2024 14:37	6/6/2024 17:01	144	620	White Bear_ME	X
16		2603556	6/7/2024 21:09	6/7/2024 22:21	72	1,717	White Bear_ME	X
17		2603711	6/8/2024 6:47	6/8/2024 8:03	76	1596	Maple Grove_MW	X
18		2605310	6/22/2024 17:20	6/22/2024 18:18	61	2792	Edina_MW	
19		2605896	6/12/2024 10:27	6/12/2024 11:44	76	948	Waconia_MW	X
20		2606288	6/12/2024 19:25	6/12/2024 22:19	174	1370	Northwest-St Cloud_NT	
21		2606457	6/12/2024 20:42	6/12/2024 21:56	73	1653	Mpls_Mtka_Plymouth_ MW	
22		2607774	6/14/2024 7:07	6/14/2024 8:11	64	2161	Mpls_Mtka_Plymouth_ MW	
23		2609079	6/15/2024 23:47	6/16/2024 1:05	77	2090	Minnetonka_MW	
24		2610370	6/17/2024 4:35		145	3672	Maple Grove_MW	X
25		2610412	6/17/2024 5:00		221	2478		X
26		2610429	6/17/2024 5:08		113	1149		X
27		2610438	6/17/2024 5:12		249	1241	Faribault_Mankato_SE	X
28		2610450	6/17/2024 5:16		89	2443		X
29		2610898	6/17/2024 7:57		36-95	931	White Bear_ME	X
30		2611798	6/17/2024 16:58		91	727	Winona_SE	X
31		2611913	6/17/2024 17:59		68	1592		X
32		2612493	6/18/2024 8:11	6/18/2024 10:11	60-120	3354	Minnetonka_MW	
33		2612669	6/18/2024 9:08	6/18/2024 10:13	64	2688	St Paul_ME	
34		2613010	6/18/2024 11:56	6/18/2024 13:19	83	1695	Minnetonka_MW	
35		2613594	6/18/2024 18:23	6/18/2024 20:00	97	2653	Mpls_Mtka_Plymouth_ MW	
36		2613811	6/18/2024 20:58		110	1712		
37		2613812	6/18/2024 20:58		192	4743		
38		2614041	6/18/2024 23:03	6/19/2024 13:56	893	2140	White Bear_ME	
39		2616924	6/21/2024 20:37	6/21/2024 23:37	180	727	Winona_SE	
40		2617065	6/22/2024 1:17		216	1090		
41		2617066	6/22/2024 1:17		216	1046		
42		2617248	6/22/2024 7:36		76	1227	Mpls_Mtka_Plymouth_ MW	
43		2617645	6/22/2024 15:57	6/22/2024 8:53	77	1,227	Mpls_Mtka_Plymouth_ MW	
44		2618609	6/24/2024 1:48	6/24/2024 21:30	1,182	570	Faribault_Mankato_SE	
45		2618663	6/24/2024 6:52	6/24/2024 8:47	115	823	Faribault_Mankato_SE	
46		2619546	6/24/2024 23:43		54-108	3636		
47		2619734	6/25/2024 2:31	6/25/2024 4:08	96	496	Northwest-St Cloud_NT	
48		2622956	6/28/2024 4:55		62	8677	Northwest-St Cloud_NT	
49		2623261	6/28/2024 7:27	6/28/2024 8:32	65	2,597	White Bear_ME	
JULY = 61 total qualifying events, 8 events with no email								
1		2625154	7/1/2024 7:45	7/1/2024 9:30	105	1,021	Faribault_Mankato_SE	
2		2625384	7/1/2024 10:48	7/1/2024 12:09	81	1406	White Bear_ME	

	Feeder	Primary Event #	Begin Time	Completion Time	Duration Min.	Customers Out	Region	Email sent to CAO
3		2625982	7/2/2024 3:23	7/2/2024 5:28	125	2,531	Mpls_Mtka_Plymouth_MW	
4		2627759	7/4/2024 14:59	7/4/2024 16:32	92	849	Minnetonka_MW	X
5		2632567	7/10/2024 15:17	7/10/2024 19:41	48-263	2904	Mpls_Mtka_Plymouth_MW	X
6		2635255	7/13/2024 15:53	7/13/2024 16:57	61-64	2426	Minnetonka_MW	X
7		2635932	7/13/2024 23:10	7/14/2024 3:58	234-288	1825	Faribault_Mankato_SE	X
8		2636186	7/14/2024 0:42	7/14/2024 3:51	189	4,173	Northwest-St Cloud_NT	X
9		2636313	7/14/2024 0:52	7/14/2024 5:24	271	1769	Maple Grove_MW	X
10		2636341	7/14/2024 0:54	7/17/2024 9:49	534	2122	Mpls_Mtka_Plymouth_MW	X
11		2636378	7/14/2024 0:56	7/14/2024 13:20	744	788	Mpls_Mtka_Plymouth_MW	X
12		2636402	7/14/2024 3:10	7/14/2024 3:41	163	2772	Maple Grove_MW	X
13		2636445	7/14/2024 0:59	7/14/2024 9:03	483	3159	Mpls_Mtka_Plymouth_MW	X
14		2636475	7/14/2024 1:00	7/14/2024 12:22	680-681	1180	Mpls_Mtka_Plymouth_MW	X
15		2636501	7/14/2024 1:01	7/14/2024 10:14	553	1,612	Mpls_Mtka_Plymouth_MW	X
16		2636535	7/14/2024 1:02	7/15/2024 4:44	1,662	1,710	Edina_MW	X
17		2636536	7/14/2024 1:02	7/14/2024 4:52	230	850	Minnetonka_MW	X
18		2636585	7/14/2024 1:03	7/14/2024 7:37	292	1476	Mpls_Mtka_Plymouth_MW	X
19		2636587	7/14/2024 1:04	7/14/2024 11:38	634-671	1451	Mpls_Mtka_Plymouth_MW	X
20		2636604	7/14/2024 1:03	7/14/2024 15:33	869	2545	Mpls_Mtka_Plymouth_MW	X
21		2636641	7/14/2024 1:04	7/14/2024 14:49	824	1635	Mpls_Mtka_Plymouth_MW	X
22		2636645	7/14/2024 1:07	7/14/2024 10:26	521	2020	Edina_MW	X
23		2636779	7/14/2024 0:57	7/14/2024 8:58	481	869	Maple Grove_MW	X
24		2636793	7/14/2024 1:07	7/14/2024 6:59	352	965	Minnetonka_MW	X
25		2636804	7/14/2024 1:07	7/14/2024 10:26	558	1926	Mpls_Mtka_Plymouth_MW	X
26		2636808	7/14/2024 1:07	7/14/2024 8:32	444	3006	Edina_MW	X
27		2636840	7/14/2024 1:08	7/14/2024 6:17	309	1712	Mpls_Mtka_Plymouth_MW	X
28		2636878	7/14/2024 1:09	7/14/2024 5:10	241	2101	Mpls_Mtka_Plymouth_MW	X
29		2636994	7/14/2024 1:10	7/14/2024 3:25	134	1968	Minnetonka_MW	X
30		2637097	7/14/2024 1:12	7/14/2024 6:33	320	2204	Mpls_Mtka_Plymouth_MW	X
31		2637154	7/14/2024 1:13	7/14/2024 15:20	483-846	1849	Edina_MW	X
32		2637338	7/14/2024 1:18	7/15/2024 17:57	2439	1576	Mpls_Mtka_Plymouth_MW	X
33		2637469	7/14/2024 1:20	7/14/2024 3:55	154	2309	Newport_ME	X
34		2637750	7/14/2024 1:30	7/14/2024 2:54	84	2269	St Paul_ME	X
35		2637910	7/14/2024 1:40	7/14/2024 4:11	150	2010	White Bear_ME	X
36		2638097	7/14/2024 1:01	7/14/2024 13:11	200-730	1076	Edina_MW	X
37		2640020	7/14/2024 1:13	7/14/2024 15:20	487	856	Edina_MW	X
38		2642079	7/14/2024 12:28	7/14/2024 17:22	294	2,419	Minnetonka_MW	X

	Feeder	Primary Event #	Begin Time	Completion Time	Duration Min.	Customers Out	Region	Email sent to CAO
39		2642655	7/14/2024 14:03	7/14/2024 15:08	64	1942	St Paul_ME	X
40		2644790	7/15/2024 5:39	7/14/2024 7:02	53-83	920	White Bear_ME	X
41		2645049	7/15/2024 8:35	7/15/2024 9:42	66	2622	Minnetonka_MW	X
42		2645758	7/15/2024 10:44	7/15/2024 12:01	77	2,606	Edina_MW	X
43		2645952	7/15/2024 12:25	7/15/2024 14:57	152	610		X
44		2646382	7/15/2024 15:49	7/15/2024 17:24	95-188	4627	St Paul_ME	X
45		2649166	7/18/2024 2:59	7/18/2024 5:41	98	1332	Mpls_Mtka_Plymouth_MW	X
46		2649302	7/18/2024 4:26	7/18/2024 6:01	96	1,583	Mpls_Mtka_Plymouth_MW	
47		2649540	7/18/2024 11:03	7/18/2024 12:18	75	1234	Mpls_Mtka_Plymouth_MW	
48		2649671	7/18/2024 2:57	7/18/2024 5:41	164	1615	Mpls_Mtka_Plymouth_MW	X
49		2652079	7/22/2024 13:42	7/22/2024 15:21	85-99	622	Maple Grove_MW	X
50		2652374	7/22/2024 17:52	7/22/2024 19:43	47-111	2922	White Bear_ME	X
51		2652800	7/22/2024 23:48	7/23/2024 0:55	48-67	912	Minnetonka_MW	X
52		2653549	7/23/2024 15:35	7/23/2024 17:24	57-109	2175	Newport_ME	
53		2657353	7/28/2024 19:08	7/28/2024 20:40	92	1020	Minnetonka_MW	X
54		2657589	7/28/2024 23:49	7/29/2024 4:21	272	2528	Minnetonka_MW	X
55		2657680	7/28/2024 23:49	7/29/2024 4:21	289	950	Minnetonka_MW	X
56		2657716	7/29/2024 2:40	7/29/2024 5:47	187	883	Minnetonka_MW	X
57		2660235	7/31/2024 16:42	7/31/2024 21:17	272	177	Minnetonka_MW	
58		2660261	7/31/2024 16:56	7/31/2024 17:58	62	2,103	Mpls_Mtka_Plymouth_MW	
59		2660408	7/31/2024 17:40	7/31/2024 19:44	123	1,629	Minnetonka_MW	
60		2661166	7/31/2024 23:15	8/1/2024 1:32	225	950	Minnetonka_MW	X
61		2661170	7/31/2024 23:15	8/1/2024 1:32	137	1,579	Minnetonka_MW	X
AUGUST = 127 total qualifying events, 2 events with no email								
1		2661472	8/1/2024 2:29	8/1/2024 3:39	70	764	Newport_ME	X
2		2661534	8/1/2024 2:53	8/1/2024 4:11	77	2163	Mpls_Mtka_Plymouth_MW	X
3		2661901	8/1/2024 7:50	8/1/2024 9:28	97	1653	St Paul_ME	X
4		2661956	8/1/2024 8:25	8/1/2024 9:38	73	1267	Faribault_Mankato_SE	X
5		2663195	8/1/2024 0:22	8/2/2024 2:34	96-132	2251	Edina_MW	X
6		2664130	8/2/2024 23:46	8/4/2024 1:15	288	1964	Minnetonka_MW	X
7		2664135	8/2/2024 23:47	8/4/2024 1:15	88	2374	Minnetonka_MW	X
8		2665312	8/3/2024 21:41	8/3/2024 23:12	52-91	2486	White Bear_ME	X
9		2665406	8/3/2024 22:22	8/4/2024 0:26	124	3178	Edina_MW	X
10		2665522	8/4/2024 0:39	8/4/2024 2:03	83	538	Faribault_Mankato_SE	X
11		2666045	8/5/2024 4:22	8/5/2024 5:49	87	2393	Maple Grove_MW	
12		2666700	8/5/2024 16:58	8/5/2024 19:45	166	2216	Mpls_Mtka_Plymouth_MW	X
13		2666703	8/5/2024 16:59	8/5/2024 18:24	85	2334	Edina_MW	X
14		2666705	8/5/2024 16:54	8/5/2024 18:13	79	614	Minnetonka_MW	
15		2666791	8/5/2024 17:13	8/5/2024 20:05	171	850	Minnetonka_MW	X
16		2666947	8/5/2024 17:42	8/5/2024 18:43	60	2415	White Bear_ME	X
17		2667096	8/5/2024 18:09	8/5/2024 19:40	91	786	Faribault_Mankato_SE	X

	Feeder	Primary Event #	Begin Time	Completion Time	Duration Min.	Customers Out	Region	Email sent to CAO
18		2667100	8/5/2024 18:09	8/5/2024 19:40	91	597	Faribault_Mankato_SE	X
19		2667179	8/5/2024 18:25	8/5/2024 19:49	83	2124	Mpls_Mtka_Plymouth_MW	X
20		2667391	8/5/2024 18:57	8/5/2024 20:26	89	655	Mpls_Mtka_Plymouth_MW	X
21		2667638	8/5/2024 19:44	8/5/2024 21:38	55-114	2139	Winona_SE	X
22		2667661	8/5/2024 19:45	8/5/2024 21:10	84	1181	St Paul_ME	X
23		2668291	8/6/2024 2:31	8/6/2024 3:30	19-844	752	Edina_MW	X
24		2669472	8/6/2024 12:54	8/6/2024 17:15	89-261	4747	Northwest-St Cloud_NT	X
25		2672397	8/10/2024 23:57	8/11/2024 1:22	85	3818	Northwest-St Cloud_NT	X
26		2672398	8/10/2024 23:57	8/11/2024 1:25	88	541	Northwest-St Cloud_NT	X
27		2672400	8/10/2024 23:57	8/11/2024 1:25	88	564	Northwest-St Cloud_NT	X
28		2672401	8/10/2024 23:57	8/11/2024 1:25	88	895	Northwest-St Cloud_NT	X
29		2673987	8/14/2024 0:00	8/14/2024 11:24	42-684	654	Mpls_Mtka_Plymouth_MW	X
30		2674590	8/14/2024 17:41	8/14/2024 19:41	38-120	667	White Bear_ME	X
31		2675888	8/16/2024 17:29	8/16/2024 19:23	113	1934	Newport_ME	X
32		2676547	8/17/2024 21:09	8/17/2024 22:12	63-1211	2279	Edina_MW	X
33		2678923	8/21/2024 22:27	8/21/2024 23:56	88-212	1149	Faribault_Mankato_SE	X
34		2680330	8/24/2024 21:27	8/24/2024 22:31	63-682	3565	Mpls_Mtka_Plymouth_MW	X
35		2681409	8/26/2024 13:25	8/26/2024 14:56	90	1840	Faribault_Mankato_SE	X
36		2681594	8/26/2024 15:29	8/26/2024 17:49	140	3665	Mpls_Mtka_Plymouth_MW	X
37		2682078	8/26/2024 18:51	8/26/2024 20:25	94	1403	Minnetonka_MW	X
38		2682082	8/26/2024 18:52	8/27/2024 4:47	186	821	Minnetonka_MW	X
39		2682087	8/26/2024 18:55	8/27/2024 2:12	437	949	Minnetonka_MW	X
40		2682089	8/26/2024 18:55	8/27/2024 0:32	336	1567	Minnetonka_MW	X
41		2682166	8/26/2024 19:01	8/27/2024 2:59	476	1638	Minnetonka_MW	X
42		2682167	8/26/2024 19:01	8/27/2024 2:59	377	1533	Minnetonka_MW	X
43		2682168	8/26/2024 19:02	8/27/2024 0:57	352	1713	Edina_MW	X
44		2682216	8/26/2024 19:05	8/27/2024 2:33	500	2420	Minnetonka_MW	X
45		2682231	8/26/2024 19:05	8/27/2024 3:26	314	2336	Minnetonka_MW	X
46		2682242	8/26/2024 19:06	8/26/2024 22:43	217	1114	Minnetonka_MW	X
47		2682256	8/26/2024 19:06	8/27/2024 0:52	345	2375	Minnetonka_MW	X
48		2682260	8/26/2024 19:06	8/27/2024 0:52	346	1926	Minnetonka_MW	X
49		2682264	8/26/2024 19:06	8/27/2024 0:38	332	1179	Edina_MW	X
50		2682306	8/26/2024 19:08	8/27/2024 0:01	292	2123	Mpls_Mtka_Plymouth_MW	X
51		2682514	8/26/2024 19:14	8/26/2024 23:54	218-280	2607	Edina_MW	X
52		2682573	8/26/2024 19:16	8/26/2024 21:55	159	2707	Edina_MW	X
53		2682586	8/26/2024 19:16	8/26/2024 22:34	197	2697	Edina_MW	X
54		2682604	8/26/2024 19:16	8/27/2024 6:37	680	1703	Minnetonka_MW	X
55		2682694	8/26/2024 19:17	8/27/2024 16:15	310-1257	1629	Mpls_Mtka_Plymouth_MW	X

	Feeder	Primary Event #	Begin Time	Completion Time	Duration Min.	Customers Out	Region	Email sent to CAO
56		2682738	8/26/2024 19:18	8/26/2024 21:27	128	3486	Mpls_Mtka_Plymouth_MW	X
57		2682776	8/26/2024 19:19	8/27/2024 1:47	387	683	Edina_MW	X
58		2682878	8/26/2024 19:21	8/26/2024 21:25	123	3436	Mpls_Mtka_Plymouth_MW	X
59		2682879	8/26/2024 19:15	8/26/2024 0:59	344	775	Edina_MW	X
60		2683020	8/26/2024 19:27	8/27/2024 17:41	650-1334	1705	Minnetonka_MW	X
61		2683162	8/26/2024 19:30	8/26/2024 22:37	141-187	1817	St Paul_ME	X
62		2683400	8/27/2024 5:38	8/27/2024 17:20	702	2159	St Paul_ME	X
63		2683564	8/26/2024 19:40	8/27/2024 0:08	128	2180	Newport_ME	X
64		2683565	8/26/2024 19:40	8/26/2024 21:33	112	1477	Mpls_Mtka_Plymouth_MW	X
65		2683616	8/27/2024 5:51	8/27/2024 17:41	252	558	White Bear_ME	X
66		2683668	8/26/2024 19:43	8/27/2024 17:41	861	2544	White Bear_ME	X
67		2683763	8/26/2024 19:46	8/26/2024 22:07	140	2069	White Bear_ME	X
68		2683894	8/26/2024 19:53	8/27/2024 0:05	252	620	White Bear_ME	X
69		2684894	8/26/2024 21:57	8/27/2024 0:08	131	2,180	Newport_ME	X
70		2685012	8/26/2024 22:16	8/27/2024 0:47	151	2,066	Mpls_Mtka_Plymouth_MW	X
71		2685178	8/26/2024 22:52	8/27/2024 17:41	32-1248	2496	Edina_MW	X
72		2685677	8/27/2024 5:05	8/27/2024 8:12	186	1639	Minnetonka_MW	X
73		2685857	8/27/2024 5:14	8/27/2024 8:27	193	2492	Minnetonka_MW	X
74		2685865	8/27/2024 5:14	8/27/2024 10:55	340	884	Minnetonka_MW	X
75		2685889	8/27/2024 5:17	8/27/2024 9:26	248	1753	Minnetonka_MW	X
76		2685894	8/27/2024 5:17	8/27/2024 11:03	345	1713	Edina_MW	X
77		2685913	8/27/2024 5:19	8/27/2024 12:01	401	1312	Edina_MW	X
78		2685977	8/27/2024 5:22	8/27/2024 8:13	170	2697	Mpls_Mtka_Plymouth_MW	X
79		2686000	8/27/2024 5:23	8/27/2024 11:07	344	2020	Edina_MW	X
80		2686031	8/27/2024 5:24	8/27/2024 9:33	248	1738	Mpls_Mtka_Plymouth_MW	X
81		2686050	8/27/2024 5:24	8/27/2024 9:51	266	1980	Mpls_Mtka_Plymouth_MW	X
82		2686072	8/27/2024 5:25	8/27/2024 11:33	367	629	Edina_MW	X
83		2686122	8/27/2024 5:26	8/27/2024 15:13	203-586	1879	Edina_MW	X
84		2686194	8/27/2024 5:28	8/27/2024 9:23	232-234	2066	Mpls_Mtka_Plymouth_MW	X
85		2686215	8/27/2024 5:25	8/27/2024 11:33	251	2785	Edina_MW	X
86		2686235	8/27/2024 5:29	8/27/2024 7:33	124	1466	Mpls_Mtka_Plymouth_MW	X
87		2686261	8/27/2024 5:29	8/27/2024 10:22	292	1635	Mpls_Mtka_Plymouth_MW	X
88		2686330	8/27/2024 5:31	8/27/2024 12:29	417	1449	Mpls_Mtka_Plymouth_MW	X
89		2686452	8/27/2024 5:34	8/27/2024 7:16	101	1958	Mpls_Mtka_Plymouth_MW	X
90		2686567	8/27/2024 5:36	8/27/2024 13:56	397-509	2193	St Paul_ME	X
91		2686568	8/27/2024 5:37	8/27/2024 13:56	432-2342	1180	St Paul_ME	X
92		2686636	8/27/2024 5:38	8/27/2024 9:26	227	1818	St Paul_ME	X
93		2686649	8/27/2024 5:39	8/27/2024 9:03	203	2816	St Paul_ME	X
94		2686652	8/27/2024 5:39	8/27/2024 8:50	190	3125	Newport_ME	X
95		2686782	8/27/2024 5:42	8/27/2024 20:07	218-865	2126	White Bear_ME	X

	Feeder	Primary Event #	Begin Time	Completion Time	Duration Min.	Customers Out	Region	Email sent to CAO
96		2686790	8/27/2024 5:43	8/28/2024 16:40	124-2131	2937	St Paul_ME	X
97		2686864	8/27/2024 5:44	8/27/2024 9:19	214	2426	St Paul_ME	X
98		2686890	8/27/2024 5:44	8/27/2024 13:24	460	674	White Bear_ME	X
99		2687016	8/27/2024 5:48	8/28/2024 9:36	120-1668	5880	White Bear_ME	X
100		2687017	8/27/2024 5:47	8/28/2024 10:29	493-1722	1211	White Bear_ME	X
101		2687169	8/27/2024 5:50	8/27/2024 10:05	191-254	2046	White Bear_ME	X
102		2687349	8/27/2024 5:56	8/27/2024 12:18	382	598	White Bear_ME	X
103		2687386	8/27/2024 5:57	8/27/2024 10:47	289	919	White Bear_ME	X
104		2687500	8/27/2024 6:01	8/27/2024 9:26	204	2599	White Bear_ME	X
105		2687501	8/27/2024 6:01	8/27/2024 10:24	263	3424	Mpls_Mtka_Plymouth_MW	X
106		2687870	8/27/2024 6:39	8/27/2024 9:39	179	1714	Edina_MW	X
107		2689247	8/27/2024 8:42	8/27/2024 11:34	171	2697	Mpls_Mtka_Plymouth_MW	X
108		2690750	8/27/2024 9:59	8/27/2024 11:10	71	1092	St Paul_ME	X
109		2698518	8/29/2024 11:55	8/29/2024 13:33	98	5845	Mpls_Mtka_Plymouth_MW	X
110		2698935	8/29/2024 15:57	8/29/2024 19:06	111-189	2382	Minnetonka_MW	X
111		2699159	8/29/2024 16:22	8/29/2024 17:43	80	1492	Maple Grove_MW	X
112		2699246	8/29/2024 16:28	8/29/2024 18:16	103-108	1657	Mpls_Mtka_Plymouth_MW	X
113		2699280	8/29/2024 16:31	8/29/2024 17:37	64-1505	2170	Mpls_Mtka_Plymouth_MW	X
114		2699402	8/29/2024 16:46	8/29/2024 17:54	67	1367	Mpls_Mtka_Plymouth_MW	X
115		2699636	8/29/2024 17:10	8/29/2024 20:51	220	708	Faribault_Mankato_SE	X
116		2699665	8/29/2024 17:11	8/29/2024 18:25	73	1591	Newport_ME	X
117		2699799	8/29/2024 17:07	8/29/2024 19:05	118	2000	Faribault_Mankato_SE	X
118		2699816	8/29/2024 17:31	8/29/2024 22:47	186-1326	1937	Newport_ME	X
119		2699833	8/29/2024 17:33	8/30/2024 11:05	246-1052	2779	Newport_ME	X
120		2699848	8/29/2024 17:34	8/30/2024 1:11	59-457	1222	Newport_ME	X
121		2699899	8/29/2024 17:39	8/29/2024 18:44	64	1202	St Paul_ME	X
122		2700050	8/29/2024 17:56	8/29/2024 19:27	90	1707	Minnetonka_MW	X
123		2700056	8/29/2024 17:35	8/29/2024 20:22	167	3090	Newport_ME	X
124		2700488	8/29/2024 19:20	8/29/2024 20:28	68-82	2108	Newport_ME	X
125		2703062	8/31/2024 12:27	8/31/2024 15:19	99-172	1988	Mpls_Mtka_Plymouth_MW	X
126		2705232	8/27/2024 5:39	8/27/2024 14:20	188-521	2289	St Paul_ME	X
127		2705441	8/29/2024 16:19	8/29/2024 18:17	118	1226	Northwest-St Cloud_NT	X
SEPTEMBER = 18 total qualifying events, 2 event with no email								
1		2709276	9/10/2024 14:41	9/10/2024 16:06	70-85	597	Minnetonka_MW	X
2		2709487	9/10/2024 17:48	9/10/2024 19:02	51-74	525	Mpls_Mtka_Plymouth_MW	X
3		2710912	9/13/2024 13:14	9/13/2024 14:45	91	1988	Mpls_Mtka_Plymouth_MW	X
4		2712788	9/17/2024 16:52		169	1234	St Paul_ME	
5		2712942	9/17/2024 17:48	9/17/2024 17:54	6-63	3885	St Paul_ME	
6		2713716	9/18/2024 18:34	9/18/2024 20:03	88	1279	Faribault_Mankato_SE	X
7		2714341	9/19/2024 17:09	9/19/2024 18:10	60	2445	Newport_ME	X

	Feeder	Primary Event #	Begin Time	Completion Time	Duration Min.	Customers Out	Region	Email sent to CAO
8		2715441	9/21/2024 8:59	9/21/2024 10:29	99	618	White Bear_ME	X
9		2715820	9/21/2024 15:47	9/21/2024 18:30	163	2445	Northwest-St Cloud_NT	X
10		2716288	9/22/2024 1:55	9/22/2024 3:52	116	2742	Northwest-St Cloud_NT	X
11		2716290	9/22/2024 1:55	9/22/2024 3:52	209-291	2371	Northwest-St Cloud_NT	X
12		2716545	9/22/2024 9:36	9/22/2024 11:05	88	2020	Mpls_Mtka_Plymouth_ MW	X
13		2716816	9/23/2024 4:08	9/23/2023 5:16	67	1815	Mpls_Mtka_Plymouth_ MW	X
14		2717518	9/24/2024 1:59	9/24/2024 3:00	50-61	2291	Mpls_Mtka_Plymouth_ MW	X
15		2720660	9/30/2024 16:32	9/30/2024 17:45	54-73	1305	Newport_ME	X
16		2726203	9/5/2024 11:27	9/5/2024 13:02	95	3096		X
17		2726204	9/5/2024 11:27	9/5/2024 13:02	95	2252	White Bear_ME	X
18		2726205	9/5/2024 11:27	9/5/2024 13:02	95	2058		X
OCTOBER = 42 total qualifying events, 2 events with no email								
1		2722229	10/2/2024 15:52	10/2/2024 18:50	68-178	1201	St Paul_ME	X
2		2723813	10/6/2024 2:22	10/6/2024 5:47	204	2263	Northwest-St Cloud_NT	X
3		2724005	10/6/2024 9:07	10/6/2024 11:07	66-120	3124	Newport_ME	X
4		2724212	10/6/2024 19:08		79	1544		
5		2724237	10/6/2024 22:35	10/7/2024 5:03	100-388	1833	White Bear_ME	X
6		2724386	10/6/2024 22:35	10/7/2024 5:03	355	553	White Bear_ME	X
7		2724831	10/7/2024 14:45	10/7/2024 16:02	63-77	1285	Maple Grove_MW	X
8		2726596	10/12/2024 10:03	10/12/2024 13:07	184	604	Northwest-St Cloud_NT	X
9		2727259	10/13/2024 21:02	10/13/2024 23:11	71-128	1396	Winona_SE	X
10		2728885	10/17/2024 13:25	10/17/2024 14:41	75	1553	Minnetonka_MW	X
11		2729146	10/17/2024 18:09	10/17/2024 20:26	137	884	Minnetonka_MW	X
12		2729573	10/18/2024 11:33	10/18/2024 15:57	65	2774	Maple Grove_MW	X
13		2729576	10/18/2024 11:33	10/18/2024 15:57	254	869	Maple Grove_MW	X
14		2729585	10/18/2024 11:33	10/18/2024 15:57	86	759	Maple Grove_MW	X
15		2729594	10/18/2024 11:33	10/18/2024 15:57	64	688	Maple Grove_MW	X
16		2729596	10/18/2024 11:33	10/18/2024 15:57	98	1291	Edina_MW	X
17		2729599	10/18/2024 11:33	10/18/2024 15:57	65	690	Minnetonka_MW	X
18		2729603	10/18/2024 11:33	10/18/2024 15:57	86	906	Minnetonka_MW	X
19		2729656	10/18/2024 11:33	10/18/2024 15:57	85	993	Edina_MW	X
21		2733004	10/11/2024 9:40	10/11/2024 10:53	47-73	1477		X
22		2733185	10/24/2024 18:04	10/24/2024 19:06	58-61	1258	Mpls_Mtka_Plymouth_ MW	X
23		2733198	10/24/2024 18:17	10/24/2024 21:06	106-169	1135	White Bear_ME	X
24		2733218	10/24/2024 18:26	10/24/2024 22:44	244-258	618	White Bear_ME	X
25		2733297	10/24/2024 18:52	10/24/2024 21:25	152	1822	Faribault_Mankato_SE	X
26		2733563	10/25/2024 1:52	10/25/2024 5:44	214	2262	Northwest-St Cloud_NT	X
27		2733622	10/25/2024 7:01	10/25/2024 7:57	42-89	3310	Mpls_Mtka_Plymouth_ MW	X
30		2735084	10/28/2024 15:24	10/28/2024 16:35	70-702	921	White Bear_ME	X
31		2735121	10/28/2024 16:07	10/29/2024 1:35	568	552	Minnetonka_MW	

	Feeder	Primary Event #	Begin Time	Completion Time	Duration Min.	Customers Out	Region	Email sent to CAO
32		2736588	10/31/2024 6:58	10/31/2024 7:53	54-186	501	Faribault_Mankato_SE	X
36		2737007	10/31/2024 12:01	10/31/2024 14:36	107-155	3829	Maple Grove_MW	X
37		2737146	10/31/2024 12:09	10/31/2024 13:52	102	2107	Maple Grove_MW	X
38		2737147	10/31/2024 12:10	10/31/2024 14:46	155	1459	Maple Grove_MW	X
39		2737148	10/31/2024 12:10	10/31/2024 14:46	156	1556	Maple Grove_MW	X
41		2737338	10/31/2024 12:50	10/31/2024 13:56	65	900	Northwest-St Cloud_NT	X
42		2737446	10/31/2024 13:06	10:31 16:04	177	1374	Mpls_Mtka_Plymouth_ MW	X
NOVEMBER = 12 total qualifying events, 0 events with no email								
1		2742565	11/10/2024 14:02	11/10/2024 15:49	106	3827	Maple Grove_MW	X
2		2742566	11/10/2024 14:02	11/10/2024 15:49	72	636	Minnetonka_MW	X
3		2744438	11/14/2024 2:50	11/14/2024 4:59	129-481	1141	Minnetonka_MW	X
4		2745330	11/15/2024 15:26	11/15/2024 16:22	75	1617	Minnetonka_MW	X
5		2745463	11/16/2024 8:52	11/16/24 10:06	41-73	1661	Edina_MW	X
6		2745753	11/17/2024 7:04	11/17/2024 8:46	93-101	2174	St Paul_ME	X
7		2746577	11/18/2024 23:47	11/18/2024 4:07	103-260	4171	White Bear_ME	X
8		2750916	11/29/2024 23:40	11/30/2024 1:11	91	3311	St Paul_ME	X
9		2750917	11/29/2024 23:40	11/30/2024 1:11	90	2646	St Paul_ME	X
10		2750919	11/29/2024 23:40	11/30/2024 1:11	97	801	St Paul_ME	X
11		2750921	11/29/2024 23:40	11/30/2024 1:11	159-2351	1186	St Paul_ME	X
12		2750926	11/29/2024 23:40	11/30/2024 1:11	89	1996	St Paul_ME	X
DECEMBER = 18 total qualifying events, 8 events with no email								
1		2752140	12/2/2024 9:30	12/2/2024 10:37	66-67	3733	Northwest-St Cloud_NT	X
2		2753988	12/4/2024 15:03		76	594		
3		2756469	12/10/2024 11:24	12/10/2024 12:43	78	3567	Faribault_Mankato_SE	X
4		2756662	12/10/2024 21:51	12/10/2024 0:18	261	832	Northwest-St Cloud_NT	X
5		2757195	12/12/2024 1:59	12/12/2024 3:28	43-70	2779	White Bear_ME	X
6		2757907	12/13/2024 12:13		111-428	665		
7		2754657	12/15/2024 18:53	12/15/2024 20:35	102	2884	Mpls_Mtka_Plymouth_ MW	X
8		2751980	12/15/2024 18:53	12/15/2024 20:37	104	1192	Mpls_Mtka_Plymouth_ MW	
9		2758915	12/16/2024 17:25		76	531		
10		2758955	12/16/2024 19:50		14-530	531		
11		2760335	12/20/2024 9:50		61	629		
12		2760505	12/20/2024 14:42	12/20/2024 15:17	32-35	1440	Edina_MW	X
13		2761374	12/24/2024 12:22	12/24/2024 13:17	52-55	1830	Mpls_Mtka_Plymouth_ MW	
14		2761574	12/25/2024 18:43		108-571	2795		
15		2762174	12/27/2024 16:12	12/27/2024 23:51	20-459	2156	White Bear_ME	X
16		2762726	12/29/2024 8:23	12/29/2024 9:54	65	1041	Minnetonka_MW	X
17		2762723	12/29/2024 8:23	12/29/2024 9:54	91	1490	Minnetonka_MW	X
18		2763000	12/30/2024 0:24	12/30/2024 2:29	58-170	1973	White Bear_ME	X

PROTECTED DATA ENDS]

- Not-Public Document – Not For Public Disclosure**
 Public Document – Not-Public Data Has Been Excised
 Public Document

Xcel Energy Information Request No. 1200
Docket No.: E002/GR-24-320
Response To: Minnesota Department of Commerce
Requestor: Andrew Bahn
Date Received: July 14, 2025

Question:

Topic: C&I Demand customers

Reference(s): BOMA Public Comment, 07/07/2025, (eDocket No. 20257-220649-01)

- A. Please address the public comment from BOMA Greater Minneapolis filed in Docket Nos. E-002/GR-24-320 and E-002/M-24-321 on July 7, 2025. Please specifically address BOMA's recommended remedies for the Commission to initiate an investigation into the systemic issues plaguing Xcel Energy's billing system and customer service operations and for the Commission to closely scrutinize and reduce Xcel Energy's requested rate increase as it relates to customer service and the utility's billing systems.
- B. Please identify on one spreadsheet, all customer service costs (including rate base, income statement, and overall revenue requirements) for the following: 2025 and 2026 test years, 2022 to 2024 actuals, and 2022 to 2024 approved amounts. Please include on a Total Company and Minnesota Jurisdictional basis with support for Minnesota Jurisdictional allocator.
- C. Please identify on one spreadsheet, all customer billing costs (including rate base, income statement, and overall revenue requirements) for the following: 2025 and 2026 test years, 2022 to 2024 actuals, and 2022 to 2024 approved amounts. Please include on a Total Company and Minnesota Jurisdictional basis with support for Minnesota Jurisdictional allocator.

Response:

- A: The remedies recommended in the public comment are grounded in the assertion that Xcel Energy's Billing and Customer Service departments have not met obligations.

The Company takes seriously the challenges described in BOMA's July 7, 2025 letter. We have been working, and are committed to continue working, to resolve outstanding billing issues for BOMA members, as we are for all customers. However, this is made significantly more difficult by BOMA's

refusal to identify the specific BOMA members (Xcel Energy customers) raising these concerns. We requested in April that BOMA identify and share the specific members who had raised their concerns so that the Company could address each specific member's concerns. BOMA has not yet identified the specific members, and as a result the Company utilized the publicly available information on BOMA's membership directory to identify as many accounts as possible for review. The Company can only resolve potential errors specific to a customer's account; we cannot resolve generalized concerns raised by a membership organization. Without a more granular level of detail, we are unfortunately unable to provide further information on potential issues that specific, unidentified BOMA members may have or their resolution.

To address each identified account associated with BOMA, leadership for the Company's Billing team regularly holds prioritization meetings. Although this team addresses the issues it is aware of, it cannot comprehensively find appropriate resolutions for the BOMA members who may need assistance without a membership list of contracts, addresses, or other similar information.

For background, BOMA members are a subset of the Company's Commercial/Industrial (C&I) customers who have experienced billing complications in the most recent 18 months of service from the Company. As with all of our customers, the Company is committed to supporting BOMA members to resolve these billing complications and ensure a smooth service experience.

Since April 2025, the Billing department has increased team resource size by 50 employees. This department continues to cross-train on the complex and nuanced nature of accurately billing C&I Customers to have billing statements timely produced. When the Company receives inquiries from BOMA—and when we are able to identify the BOMA member raising the concern—we reach out directly to the member to seek to resolve their concern. The direct engagement and communication with BOMA members help with work prioritization and create a more specialized customer service experience with specific members, which positively impacts the time it takes to resolve inquiries.

Regarding specific examples provided in the BOMA Comments, the Company offers the following information:

\$37.4M Billing Error

The \$37.4M bill mentioned was caused by a human error and was rectified months ago. Coaching and training occurred following this rare event to ensure all of the appropriate parties were alerted of the severity of the human error.

Billing Delays

Delays in billing are being addressed with proactive and collaborative efforts to identify accounts, processes, and technology opportunities to reduce the amount of bills which are delayed.

Net Metering Concerns

BOMA states that “at least one customer using net metering” received inaccurate bills not reflecting the expected usage and credits for solar production. The Company routinely provides net metered bills and can investigate this issue if BOMA provides us the name of the customer or customers experiencing the issue. We cannot resolve it if we do not know the customer(s) involved.

Returned Checks

Regarding BOMA’s example of returned checks, the Company’s Payment Processing organization updated its remittance address in 2024. Our customers were notified of this change through their billing statements. To ensure continuity, payments sent to the former address were temporarily forwarded by the United States Postal Service (USPS) to our nearest processing center in Carol Stream, IL. USPS forwarding services for the old address expired on March 31, 2025. As a result, a limited number of payments were returned to customers and some customers experienced delayed payment processing and posting. We are continuing to monitor the situation and are taking steps to further reinforce communication, through email and outbound calls with affected customers to prevent future occurrences.

Miscellaneous

In regard to the “Miscellaneous Other Issues” section of BOMA’s July 7, 2025 letter: rate changes and any associated delays are treated with their own prioritization meetings, held on a regular basis with Billing leadership. The Company additionally understands that there have been delays in refund processing and rebilling. The additional employee resources mentioned here have led to significant improvements. The Company would like the

opportunity to address the accusation of denial of credits owed to any BOMA member. Each account would need to be reviewed to see what is owed, what has been credited and resolve within rules governing the Company. We would request that BOMA engage with our Billing department on specific customer (BOMA member) accounts so we can reach resolution.

BOMA has now filed virtually identical comments in two dockets – the July 7, 2025 letter in Docket Nos. E-002/GR-24-320, and July 11, 2025 Initial Comments in Docket No. E-002/M-25-27 – in both cases proposing the “Commission initiate an investigation into the systemic issues plaguing Xcel Energy’s billing system and customer service operations” and proposing denial of the Company’s rate request in E-002/GR-24-320. Yet BOMA continues to refuse to identify the specific BOMA members (Xcel Energy customers) raising the concerns, which is necessary to ensure the Company is able to resolve those concerns.

B: The Company objects to this request as overly broad, unduly burdensome, and that it requests information or documents not kept in the usual course of business. Subject to and without waiving the foregoing objection, please see Attachment A to this request.

C: The Company objects to this request as overly broad, unduly burdensome, and that it requests information or documents not kept in the usual course of business. Subject to and without waiving the foregoing objection, please see Attachment A to this request.

Witness:	Nora C. Lindgren	
Preparer:	Kallie M. Robb	Kiem S. Thang
Title:	Dir, Billing Operations	Financial Consultant
Department:	Billing Services	Shared Financial Services
Telephone:	715-737-3055	303-571-6523

	As to the objection:
Preparer:	Eric F. Swanson
Title:	Shareholder
Department:	Winthrop & Weinstine, P.A.
Telephone:	612-604-6511
Date:	July 24, 2025

Northern States Power Company

Docket No. E002/GR-24-320
 DOC IR No. 1200
 Attachment A - Page 1 of 1

Customer Care O&M Expense Levels
 (\$s)

Director	Cost Element	Total NSP Electric										Total MN Electric Jurisdiction					
		2021 Actual	2022 Actual	2023 Actual	2024 Actual	2025 Test Year	2026 Plan Year	2022 Approved	2023 Approved	2024 Approved	2021 Actual	2022 Actual	2023 Actual	2024 Actual	2025 Test Year	2026 Plan Year	
Billing Services	Labor	1,924,179	2,061,372	2,079,684	1,092,185	816,133	843,248	2,181,102	2,249,094	2,328,173	1,679,847	1,798,697	1,813,584	952,423	711,372	735,007	
	Contract Labor	4,222			4,728			12,048	12,048	12,048	3,686			4,122			
	Outside Services	1,167,947	1,272,419	1,525,486	2,192,570	2,027,711	2,022,793	1,107,910	1,107,910	1,107,910	1,019,641	1,110,279	1,330,298	1,913,643	1,767,430		
	Employee Expense	1,488	6,706	8,637	17,372	6,850	6,850	19,006	19,006	19,006	1,299	5,851	7,531	15,145	5,971		
	Postage	3,486,973	3,736,994	3,984,148	2,637,938	4,676,324	5,085,120	3,655,263	3,960,489	4,289,193	3,044,197	3,260,800	3,474,372	2,112,638	4,076,062		
	Credit Card Fees				1,459,853	2,475,473	2,991,565							1,459,853	2,475,473		
	Net Other*	158,117	148,825	163,859	1,393,112	176,288	176,288	147,753	154,568	161,793	138,015	129,893	142,846	1,363,231	153,659		
Billing Services Total		6,742,926	7,226,315	7,761,813	8,797,758	10,178,779	11,125,864	7,123,082	7,503,115	7,918,123	5,886,684	6,305,520	6,768,633	7,821,054	9,189,967		
Contact Center	Labor	4,112,399	5,027,676	4,840,651	4,417,960	4,600,477	4,722,331	3,893,910	3,871,837	4,002,100	3,590,206	4,388,882	4,221,284	3,851,771	4,009,951		
	Outside Services	62,031	63,065	48,329	66,221	30,023	30,023	30,087	30,087	30,087	54,155	55,028	42,146	57,732	26,169		
	Employee Expense	12,011	26,961	19,708	17,332	27,528	27,528	45,824	45,824	45,824	10,486	23,525	17,186	15,110	23,995		
	Postage	2,414	2,326	2,876	2,419	4,148	4,148	4,157	4,157	4,157	2,108	2,030	2,508	2,109	3,615		
	Net Other*	6,786	56,922	4,248	3,454	(36,655)	(37,520)	50,143	50,314	50,314	5,924	49,683	3,704	3,012	(31,962)		
Contact Center Total		4,195,641	5,176,949	4,915,812	4,507,386	4,625,520	4,746,509	4,024,121	4,002,219	4,132,482	3,662,878	4,519,148	4,286,829	3,929,734	4,031,767		
Credit & Collections	Labor	1,906,878	2,002,282	2,234,938	1,864,048	2,340,955	2,416,382	1,986,507	2,033,774	2,108,506	1,664,743	1,748,052	1,948,976	1,625,094	2,040,465		
	Outside Services	502,401	457,928	427,563	479,668	482,810	482,810	483,421	483,421	483,421	438,606	399,576	372,856	418,179	420,836		
	Employee Expense	4,948	21,302	7,041	4,110	21,636	21,636	25,090	25,090	25,090	4,319	18,587	6,140	3,583	18,859		
	Postage	4,818	258	65	94	1,443	1,443	1,446	1,446	1,446	4,207	1,446	57	82	1,258		
	Net Other*	17,904	16,023	11,551	5,952	7,465	7,465	31,379	32,216	32,216	15,631	13,982	10,072	5,189	6,507		
Credit & Collections Total		2,436,950	2,497,793	2,681,158	2,353,872	2,854,310	2,929,736	2,527,842	2,575,947	2,650,678	2,127,505	2,180,423	2,338,100	2,052,126	2,487,925		
Cust Care, Measurement & Analytics	Labor	1,151,154	1,170,936	1,187,874	1,374,275	1,288,357	1,465,099	1,046,427	1,077,766	1,113,755	1,004,981	1,022,154	1,035,883	1,198,636	1,122,981		
	Contract Labor	194		1,463							169		1,276		1,277,036		
	Outside Services	151,450	269,183	241,994	3,497,400	200,047	200,047	256,064	256,980	257,911	132,219	234,882	211,030	3,049,065	174,368		
	Employee Expense	39,683	41,945	13,650	20,724	15,565	17,117	26,042	26,042	26,042	34,644	36,600	11,903	18,068	13,567		
	Postage	212	10	144	2,533	297	327	298	298	298	185	9	126	2,208	259		
	Net Other*	43,142	49,742	67,767	42,676	12,789	13,086	111,722	111,722	111,722	37,664	43,404	59,096	37,204	11,148		
Cust Care, Measurement & Analytics Total		1,385,836	1,531,817	1,512,892	4,937,608	1,517,055	1,695,676	1,440,552	1,472,808	1,509,727	1,209,862	1,337,049	1,319,315	4,305,181	1,322,322		
Customer Policy and Assistance	Labor	485,970	580,553	697,065	483,657	766,704	659,619	529,319	545,146	563,454	424,262	506,575	607,875	421,656	668,288		
	Contract Labor		66			398	398	398	398	398			58		347		
	Outside Services	47,736	47,398	47,838	47,338	45,725	45,725	45,824	45,824	45,824	41,674	41,358	41,717	41,270	39,856		
	Employee Expense	1,263	5,843	5,967	8,447	6,586	5,033	10,052	10,052	10,052	1,103	5,099	5,204	7,364	4,387		
	Postage	9,488	55,754	8,172	1,133	80	50	81	81	81	8,283	48,649	7,126	988	70		
	Net Other*	64,968	147,065	17,723	2,672	62,313	62,016	63,464	63,464	63,464	56,719	128,325	15,454	2,330	54,314		
Customer Policy and Assistance Total		609,426	836,613	776,831	543,247	881,806	772,842	649,138	664,965	683,274	532,041	730,006	677,434	473,607	768,615		
Meter Reading	Labor	2,362,575	2,270,331	2,559,460	2,800,185	4,135,501	4,260,706	2,661,217	2,815,920	2,920,365	1,894,471	1,833,716	1,947,211	2,268,777	3,395,353		
	AMI Saving					(7,891,872)	(9,343,058)	(1,297,189)	(4,547,874)	(7,833,873)					(7,891,872)		
	Contract Labor	44,976	48,155	45,419	21,943	41,046	41,046	41,078	41,078	41,078	-	4,612	21,888	21,943	1,591		
	Outside Services	19,116,154	15,107,784	13,639,314	9,168,209	15,046,667	14,797,176	15,600,363	15,709,170	15,819,072	17,374,773	13,161,813	11,653,721	7,673,033	13,616,701		
	Employee Expense	75,674	90,102	92,852	83,946	114,223	114,223	156,272	156,272	156,272	62,669	76,699	61,008	64,977	94,211		
	Postage	658	1,848	634	535	1,712	1,712	1,714	1,714	1,714	509	1,563	514	433	632		
	Net Other*	(576,705)	368,662	450,977	458,441	288,135	288,135	198,113	198,176	198,176	(635,200)	305,717	390,760	407,641	236,397		
Meter Reading Total		21,023,331	17,886,881	16,788,656	12,533,261	11,735,412	10,159,940	17,361,568	14,374,456	11,302,805	18,697,221	15,384,121	14,075,102	10,436,804	9,453,012		
Grand Total		36,394,109	35,156,368	34,437,162	33,673,131	31,792,881	31,430,568	33,126,303	30,593,511	28,197,088	32,116,192	30,456,267	29,465,413	29,018,506	27,253,609		

* All accounts included in the "Net Other" category from Page 1

CERTIFICATE OF SERVICE

I, Christine Schwartz, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States mail at Minneapolis, Minnesota

xx electronic filing

DOCKET No. E002/M-25-27

Dated this 8th day of August 2025

/s/

Christine Schwartz
Regulatory Administrator

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Marisa	Bayer	mbayer@edinamn.gov	City of Edina		4801 W 50th St Edina MN, 55424 United States	Electronic Service		No	Official 25-27
2	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	Official 25-27
3	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	Official 25-27
4	Olivia	Carroll	oliviac@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St W1360 St. Paul MN, 55101 United States	Electronic Service		No	Official 25-27
5	Gabriel	Chan	gabechan@umn.edu			130 Hubert H. Humphrey Center 301 19th Ave S Minneapolis MN, 55455 United States	Electronic Service		No	Official 25-27
6	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St, Louis MO, 63119-2044 United States	Electronic Service		No	Official 25-27
7	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	Official 25-27
8	Riley	Conlin	riley.conlin@xcelenergy.com	Northern States Power Company dba Xcel Energy-Elec		414 Nicollet Mall, 401 8th Floor Minneapolis MN, 55401 United States	Electronic Service		No	Official 25-27
9	Brandon	Crawford	brandonc@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 St. Paul MN, 55101 United States	Electronic Service		No	Official 25-27
10	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	Official 25-27
11	Christopher	Droske	christopher.droske@minneapolismn.gov	Northern States Power Company dba Xcel Energy-Elec		661 5th Ave N Minneapolis MN, 55405 United States	Electronic Service		No	Official 25-27
12	John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance		2720 E. 22nd St Institute for Local Self-Reliance Minneapolis MN, 55406 United States	Electronic Service		No	Official 25-27

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
13	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	Official 25-27
14	Shubha	Harris	shubha.m.harris@xcelenergy.com	Xcel Energy		414 Nicollet Mall, 401 - FL 8 Minneapolis MN, 55401 United States	Electronic Service		No	Official 25-27
15	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	Official 25-27
16	Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.		445 Etna Street Ste. 61 St. Paul MN, 55106 United States	Electronic Service		No	Official 25-27
17	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	Official 25-27
18	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-27
19	Sarah	Johnson Phillips	sphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-27
20	William	Kenworthy	will@votesolar.org			1 South Dearborn St Ste 2000 Chicago IL, 60603 United States	Electronic Service		No	Official 25-27
21	Samuel B.	Ketchum	sketchum@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-27
22	Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.		8300 Norman Center Drive Suite 1000 Bloomington MN, 55437 United States	Electronic Service		No	Official 25-27
23	Annie	Levenson Falk	annief@cupminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	Official 25-27
24	Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	Official 25-27
25	Erica	McConnell	emcconnell@elpc.org	Environmental Law & Policy Center		35 E. Wacker Drive, Suite 1600 Chicago IL,	Electronic Service		No	Official 25-27

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						60601 United States				
26	Tony	Mendoza	tony.mendoza@sierraclub.org	Sierra Club Environmental Law Program		2101 Webster St. 13th Floor Oakland CA, 94612 United States	Electronic Service		No	Official 25-27
27	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	Official 25-27
28	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	Official 25-27
29	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-27
30	Pouya	Najmaie	najm0001@gmail.com	Cooperative Energy Futures		3416 16th Ave S Minneapolis MN, 55407 United States	Electronic Service		No	Official 25-27
31	Scott	Neal	sneal@edinamn.gov	City of Edina		4801 W 50th St Edina MN, 55424 United States	Electronic Service		No	Official 25-27
32	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-27
33	Carol A.	Overland	overland@legalectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	Official 25-27
34	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	Official 25-27
35	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy		26 E Exchange St, Ste 206 St. Paul MN, 55101-1667 United States	Electronic Service		No	Official 25-27
36	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall, MN1180-07- MCA Minneapolis MN, 55401- 1993 United States	Electronic Service		No	Official 25-27
37	George	Shardlow	george@energycents.org	Energy CENTS Coalition		823 E. 7th Street Saint Paul MN, 55106 United States	Electronic Service		No	Official 25-27
38	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	Official 25-27

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
39	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-27
40	Lauren	Steinhaeuser	lauren.steinhaeuser@xcelenergy.com	Northern States Power Company dba Xcel Energy		414 Nicollet Mall, 401-08 Minneapolis MN, 55401 United States	Electronic Service		No	Official 25-27
41	James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-27
42	Carla	Vita	carla.vita@state.mn.us	MN DEED		Great Northern Building 12th Floor 180 East Fifth Street St. Paul MN, 55101 United States	Electronic Service		No	Official 25-27
43	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-27
44	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	Official 25-27
45	Patrick	Zomer	pat.zomer@lawmoss.com	Moss & Barnett PA		150 S 5th St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-27