

September 23, 2025

Sasha Bergman  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7th Place East, Suite 350  
St. Paul, Minnesota 55101-2147

RE: Comments of the Minnesota Department of Commerce  
Docket No. G-002/M-25-31

Dear Ms. Bergman:

Attached are the comments of the Minnesota Department of Commerce (Department) in the following matter:

*2024 Annual Gas Service Quality Report (Report) submitted by Northern States Power Company, doing business as Xcel Energy (Xcel or the Company).*

The Petition was filed by Xcel on May 1, 2025.

The Department recommends the Minnesota Public Utilities Commission (Commission) **accept** Xcel's 2024 Annual Gas Service Quality Report. The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ Dr. SYDNIE LIEB  
Assistant Commissioner of Regulatory Analysis

KB/ar  
Attachment

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## Acronyms, Abbreviations and Definitions

### Acronyms and Abbreviations

<b>AMR</b>	Automated Meter Reading
<b>CWR</b>	Cold Weather Rule
<b>CAO</b>	Consumer Affairs Office (of the Public Utilities Commission)
<b>CAG</b>	Customer Advocate Group
<b>EFV</b>	Excess Flow Valves
<b>IR</b>	Information Request
<b>IVR</b>	Interactive Voice Response
<b>MNOPS</b>	Minnesota Office of Pipeline Safety
<b>PHMSA</b>	United States Department of Transportation, Pipeline and Hazardous Materials Safety Administration
<b>PUC</b>	Public Utilities Commission
<b>SRSQ</b>	Safety, Reliability, and Service Quality
<b>Xcel</b>	Xcel Energy

### Definitions

<b>Annual Report or SRSQ Report</b>	Calendar year 2024 information related to Commission reporting requirements encompassing topics identified in Minn. R. 7826. Those topics include service quality, reliability, and safety.
<b>Filing</b>	Information provided in response to reporting requirements in Minn. R. 7826.
<b>Petition</b>	For this document, the Petition includes the filing, service quality and safety reports.



# Before the Minnesota Public Utilities Commission

## Comments of the Minnesota Department of Commerce

Docket No. G-002/M-25-31

### I. INTRODUCTION

Xcel filed its Annual Report on Natural Gas Service Quality (2024 SRSQ Report or Annual Report) for 2024 on May 1, 2025 in compliance with the Commission Orders and requirements from Docket Nos. G002,G022,G004,G011,G008/CI-22-548.

The Minnesota Public Utilities Commission (Commission) established reporting requirements for natural gas local distribution companies regarding service quality and reliability in 2010 and has adjusted and increased the reporting requirements since that time. The Annual Report on Natural Gas Service Quality provides an overview on the utility’s operational performance for the previous year.

### II. PROCEDURAL BACKGROUND

August 26, 2010	The Commission issues an Order approving gas service quality reporting requirements. <sup>1</sup>
December 22, 2023	The Commission issues an Order adopting recommendations 1-9 of the Natural Gas Working Group. <sup>2</sup>
February 2, 2024	The Commission issues a Notice of Gas Quality Service Quality Reporting Requirements. <sup>3</sup>
May 1, 2025	Xcel files its 2024 annual gas service quality report. <sup>4</sup>
May 12, 2025	The Commission issues a notice of comment period for the petition. <sup>5</sup>

<sup>1</sup> *In the Matter of a Commission Investigation Into Gas Utility Service Quality Standard, Order Setting Reporting Requirements*, August 26, 2010, Docket No. G-999/CI-09-409, (eDockets) [20108-53874-01](#) (hereinafter “August 26, 2010 Order”).

<sup>2</sup> *In the Matter of an Exploration of Comparative Performance Metrics and Improvements to Natural Gas Service Quality Reports*, Order, December 22, 2023, Docket No. G002/CI-22-548 (eDockets) [202312-201514-01](#) (hereinafter “December 22, 2023 Order”).

<sup>3</sup> *In the Matter of an Exploration of Comparative Performance Metrics and Improvements to Natural Gas Service Quality Reports, Notice of Reporting Requirements*, February 2, 2024, Docket No. G002/CI-22-548, (eDockets) [20242-203037-01](#) (hereinafter “February 2, 2024 Order”).

<sup>4</sup> *In the Matter of Northern States Power Company’s Annual Report on Natural Gas Service Quality for 2024*, Xcel Energy, Initial Filing, May 1, 2025, Docket No. G002/M-25-31, (eDockets) [20255-218491-01](#) (hereinafter “Petition”).

<sup>5</sup> *In the Matter of Northern States Power Co. d/b/a Xcel Energy’s 2024 Annual Gas Service Quality Report, Notice of Comment Period*, May 12, 2025, Docket No.G-002/M-25-31, (eDockets) [20255-218822-01](#).

Topic(s) open for comment:

- Should the Commission accept Xcel Energy, Great Plains, CenterPoint Energy, Minnesota Energy Resources, and Greater Minnesota Gas' 2024 Annual Gas Service Quality Reports?
- Are there other issues or concerns related to this matter?

The Minnesota Department of Commerce, Division of Energy Resources (Department) submits the following comments, pursuant to the Commission's notice.<sup>6</sup>

### III. SUMMARY OF REPORT AND DEPARTMENT ANALYSIS

The reporting requirements are summarized in the February 2, 2024 Notice of Gas Service Quality Reporting Requirements in Docket No. G002,G022,G004,G011,G008/CI-22-548 along with references to the original Commission orders establishing the requirements. Many of Xcel's initial reporting requirements were set in the August 26, 2010 Order in Docket No. G999/CI-09-409 and are in alignment with the electric utilities' reporting requirements as documented in Minn. Rules 7826.

The Department responds to the questions in the Commission notice and provides a review of Xcel's 2024 Annual Report to assess compliance with the reporting requirements established by the Commission. The Department uses information from past annual reports to facilitate identification of issues and trends regarding Xcel's performance.

#### A. RESPONSE TO NOTICE TOPICS

- A.1. *Should the Commission accept Xcel Energy, Great Plains, CenterPoint Energy, Minnesota Energy Resources, and Greater Minnesota Gas' 2024 Annual Gas Service Quality Reports?*

The Department recommends that the Commission accept Xcel's 2024 Annual Natural Gas Service Quality Report. Xcel provided all the required information and is consistent with its 10-year average. Xcel provides explanations when the data deviate from the expected average.

- A.2. *Are there other issues or concerns related to this matter?*

The Department has no other issues or concerns related to this matter.

#### B. REPORT ANALYSIS

The Department reviewed Xcel's 2024 Report to assess compliance with the updated reporting requirements established by the Commission in Docket 22-548. The Department used information from past annual reports to facilitate identification of issues and trends regarding Xcel's performance.

Below is a summary of the Department's review of Xcel's 2024 Report.

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<sup>6</sup> *Ibid.*

*B.1. Call Center Response Time*

The Orders in Docket Nos. G999/CI-09-409 and G002/M-11-360 established the reporting requirements for natural gas providers’ call center response time.<sup>7</sup> Gas utilities are required to report the percent of calls answered within 20 seconds and the average time to answer an incoming call. The call center response time requirements are based on Minnesota Rules 7826.1200 for electric utilities, which state that utilities shall answer 80% of calls during business hours within 20 seconds.<sup>8</sup>

**Table 1: Call Center Response Times for Xcel<sup>9</sup>**

Year	Avg. Speed (Seconds)	Including IVR Calls		Excluding IVR Calls	
		# of calls	12 Mo. Avg.	# of calls	12 Mo. Avg.
2015	18	3,743,635	90.9%	1,659,827	78.3%
2016	21	3,579,038	89.9%	1,658,646	75.9%
2017	21	3,222,187	90.1%	1,460,623	76.6%
2018	22	3,042,040	91.1%	1,312,367	77.2%
2019	27	2,882,333	90.8%	1,288,811	76.8%
2020	151	2,555,155	85.8%	997,622	59.4%
2021	191	2,493,516	82.9%	992,533	52.0%
2022	127	2,663,988	84.6%	1,116,997	58.9%
2023	76	2,710,725	85.3%	1,199,945	61.8%
2024	349	1,421,312	79.7%	1,222,018	42.6%
<b>10-year Avg.</b>	<b>100.3</b>	<b>2,831,393</b>	<b>87.1%</b>	<b>1,290,939</b>	<b>66.0%</b>

As shown in Table 1, Xcel experienced a decline in call performance over the past year, after an improvement in 2022 and 2023 and a prior decline in 2021. The average speed of answer was 76 seconds in 2023 and increased significantly in 2024 to 349 seconds.

Including Interactive Voice Response (IVR) calls, the Company answered 79.7% of calls within 20 seconds. Based on the data provided by the Company, Xcel did not meet the call center response time requirement, which specifies that utilities should answer 80% of calls during business hours within 20 seconds. Xcel reported that staffing challenges and severe weather events were the main reasons of the low Telephone Response Time performance in 2024.<sup>10</sup> For agent-only calls (excluding IVR calls), the Company answered 42.6% of calls within 20 seconds, which is 19.2% lower than 2023. May was the lowest performance month for call center response times (including IVR calls) with 69.3% calls

<sup>7</sup> *In the Matter of a Commission Investigation Into Gas Utility Service Quality Standards*, Order, August 26, 2010, Docket No. G999/CI-09-409, (eDockets) [20108-53874-01](#) (hereinafter “August 26, 2010 Order”); *In the Matter of the Annual Natural Gas Service Quality Report for 2010 for Northern States Power Company*, Order, March 6, 2012, Docket No. G002/M-11-360, (eDockets) [20123-72272-06](#).

<sup>8</sup> [Minn. R. 7826.1200](#).

<sup>9</sup> Petition at Attachment B.

<sup>10</sup> Petition at 2.

answered within 20 seconds. November and December were the highest performance months with a peak of 98.1% of agent-only calls answered within 20 seconds.

In initial comments filed in Docket Nos. E,G002/M-12-383 and E,G002/CI-02-2034, the Department noted that Xcel did not meet the 2024 call center response time requirement outlined in the Quality Service Plan Tariff.<sup>11</sup> The Department requests that Xcel clarify, in reply comments, how the Company plans to meet the call center response time requirement in the future.

The Department concludes that Xcel met the service quality reporting requirements for call center data.

### *B.2. Meter Reading Performance*

The following information is required for reporting on meter-reading performance by customer class for each month:

- The number and percentage of customer meters read by utility personnel;
- The number and percentage of customer meters self-read by customers;
- The number and percentage of customer meters that have not been read by utility personnel for periods of six to 12 months and for period of longer than 12 months, and an explanation as to why they have not been read; and
- Data on monthly meter-reading staffing levels, by work center or geographical area.<sup>12</sup>

Xcel also provided detailed meter-reading information, which includes information on its monthly meter-reading staffing levels.

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<sup>11</sup> *In the Matter of the Petition of Northern States Power Company d/b/a Xcel Energy for Approval of Amendments to its Natural Gas and Electric Service-Quality Tariffs, In the Matter of an Investigation and Audits of Northern States Power Company's Service-Quality Reporting*, Department, Initial Comments, July 22, 2025 Docket Nos. E,G-002/CI-02-2034 and E,G002/M-12-383, (eDockets) [20257-221290-01](#).

<sup>12</sup> [Minn R. 7826.1400](#).

**Table 2: Meter-Reading Performance 2015-2024<sup>13</sup>**

Year	Percent Read by Company	Percent Read by Customer	Average Number of Meter Reading Personnel
2015	98.07%	0.0008%	14.7
2016	96.59%	0.0008%	13.5
2017	96.71%	0.0005%	12.5
2018	96.94%	0.0003%	12.2
2019	99.87%	0.0004%	12.2
2020	99.84%	0.0006%	12.5
2021	99.82%	0.0003%	12.4
2022	93.89%	0.0005%	12.3
2023	99.78%	0.0005%	28.9 <sup>14</sup>
2024	99.76%	0.0004%	27.2
<b>10-Year Avg.</b>	<b>98.13%</b>	<b>0.0005%</b>	<b>15.8</b>

Table 2 above summarizes Xcel’s meter-reading statistics. In 2024, the Company reported utility personnel read an average of 99.76% of customer meters, while customers read 0.0004%. In response to the Department’s request for information on Automated Meter Reading (AMR) meters, Xcel stated that AMR meters account for 99.66 percent of all meters, and AMR systems completed 99.30 percent of all actual reads.<sup>15</sup>

The most common reason across all customer classes for failure of meters to be read “No Reading Returned” (76.9%).<sup>16</sup> “No Reading Returned” entries are related to situations where Xcel is unsuccessful in getting a manual read and the Company shifts focus to meters that either had not attempted to read previously or knew that we would have access to.<sup>17</sup>

Xcel reported 27.2 meter-reading staff in 2024, which is consistent with 2023 (28.9 meter-reading staff). The increase in staffing reported in 2023 resulted from the Company’s decision to consolidate meter-reading and field representative staff into a larger universal team.<sup>18</sup>

The Department concludes that Xcel met the meter reading reporting requirements for 2024.

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<sup>13</sup> Petition at Attachment C.

<sup>14</sup> *Id.*, at 5. In 2023, meter reading staff were combined with field representative staff to create a larger “universal team” with responsibilities broader than the prior years’ meter-reading staff.

<sup>15</sup> Xcel’s response to Department IR 1.

<sup>16</sup> *Id.*, at Attachment C.

<sup>17</sup> *Id.*, at 4.

<sup>18</sup> *Id.*, at 6.

*B.3. Involuntary Service Disconnection data*

Xcel is required to provide the involuntary disconnections data it reports under Minn. Stat. § 216B.091 and § 216B.096 (Cold Weather Rule reports) with its annual service quality report.<sup>19</sup>

**Table 3a: Residential Customer Involuntary Disconnect Information<sup>20</sup>**

Year	Received Disconnect Notice	CWR Protection		Disconnected Involuntarily	Restored within 24 Hours		Restored by Entering Payment Plan
		Sought/Granted	% Granted		Count	%	
2015	1,042,775	152,992	100%	26,394	11,556	44%	1,201
2016	870,665	130,052	100%	20,584	7,698	37%	1,512
2017	747,409	140,943	100%	19,211	6,587	34%	1,254
2018	559,011	115,472	100%	17,310	6,486	37%	1,469
2019	521,548	78,271	100%	16,699	6,318	38%	4,250
2020	222,803	58,225	100%	2,820	1,610	57%	969
2021	396,367	80,143	100%	6,292	3,466	55%	3,889
2022	678,664	126,910	100%	8,538	3,197	37%	5,533
2023	774,507	132,831	100%	24,722	11,126	45%	12,248
2024	734,696	118,058	100%	52,531	30,019	57%	26,040
<b>10-Year Avg.</b>	<b>654,845</b>	<b>113,390</b>	<b>100%</b>	<b>19,510</b>	<b>8,806</b>	<b>44%</b>	<b>5,837</b>

Table 3a above summarizes Xcel’s residential customer disconnection statistics. In 2024, Xcel sent 734,696 disconnection notices and disconnected 52,531 residential customers for non-payment. 57% of those customers were re-connected within 24 hours. The number of customers restored by entering a payment plan in 2024 continues to increase over the last five years.<sup>21</sup> The disconnections reported by Xcel in 2024 were predominantly electric customers.<sup>22</sup> Xcel believes that the increase in disconnection in 2024 is the result of past and current economic challenges, and higher arrear balances.<sup>23</sup> The Company also acknowledges the Commission’s Order to modify its disconnection policy, which may lead to fewer disconnections in the future.<sup>24</sup>

<sup>19</sup> August 26, 2010 Order at 5.

<sup>20</sup> Petition, at Attachment D-2.

<sup>21</sup> *Ibid.*

<sup>22</sup> *Ibid.*

<sup>23</sup> Petition, at 7.

<sup>24</sup> *In the Matter of Xcel Energy’s 2023 Annual Safety, Reliability and Service Quality Report, Order Accepting Reports and Setting Additional Requirements*, January 13, 2025, Docket No. E-002/M-24-27 (eDockets) [20251-213880-01](#), at 5-6 (hereinafter “2023 Petition”).

**Table 3b: Average Data on Customers with Past Due Amounts and Payment Arrangements<sup>25</sup>**

	<b>Average Number of Past Due Residential Customers</b>	<b>Average Past Due Dollar Amount Per Past Due Customers</b>	<b>Average Number of Customers with Current Payment Arrangements</b>
2020	163,420	\$371	Not Available
2021	165,378	\$502	22,596
2022	176,058	\$503	35,006
2023	185,529	\$540	37,693
2024	178,510	\$499	34,410
<b>5-Year Avg.</b>	<b>173,779</b>	<b>\$515</b>	<b>32,426<sup>26</sup></b>

Table 3b above shows that the average number of past due residential customers decreased from 185,529 customers in 2023 to 178,510 customers in 2024. Additionally, both the average past due dollar amount per past due customer and the number of customers with current payment arrangements decreased.

The Department concludes that Xcel met the involuntary disconnection reporting requirements for 2024.

*B.4. Service Extension Requests*

The following information is required for reporting on service extension request response times by customer class and calendar month:

- The number of customers requesting service to a location not previously served by the utility and the intervals between the date service was installed and the later of the in-service date requested by the customer or the date the premises were ready for service; and
- The number of customers requesting service to a location previously served by the utility, but not served at the time of the request, and the intervals between the date service was installed and the later of the in-service date requested by the customer or the date the premises were ready for service.<sup>27</sup>

Utilities shall also report the types of extension requests, such as requests for reconnection after disconnection from nonpayment, for locations previously served and not previously served.<sup>28</sup>

<sup>25</sup> Petition, at Attachment D-1.

<sup>26</sup> Figure is a four-year average since the 2020 average number of customers with current payment arrangement counts is not available.

<sup>27</sup> [Minn. R. 7826.1600](#).

<sup>28</sup> *In the Matter of the Annual Natural Gas Service Quality Report for 2010 for Northern States Power Company, a Minnesota Corporation, Order Accepting Reports and Setting Further Requirements*, March 6, 2012, Docket No. G002/M-11-360 (eDockets) [20123-72274-06](#).

**Table 4a: Service Extension Requests for New Locations<sup>29</sup>**

	Residential		Commercial	
	# of Installations	Avg. Days to Complete	# of Installations	Avg. Days to Complete
2020-2024 Avg.	3,296	4.96	185	16.58
2024 Actual	3,356	6.05	262	30.87

Table 4a above demonstrates Xcel’s 2024 service extension request data for new service extensions requests. In 2024, Xcel’s residential service extension requests for new locations were up compared to the five-year average, and the average number of days to complete the requests is higher than the five-year average. The number of commercial requests for new locations was up compared to the five-year average, and the average days to complete commercial new service extension requests was up significantly in 2024. Xcel stated that commercial services are more complex, involve larger diameters, and take additional time to install and coordinate with commercial customers to confirm loads and properly size the service and meter.<sup>30</sup>

**Table 4b: Service Extension Requests for Locations Previously Served<sup>31</sup>**

	Residential		Commercial	
	# of Installations	Avg. Days to Complete	# of Installations	Avg. Days to Complete
2020-2024 Avg.	496	2.08	111	2.06
2024 Actual	348	3.20	78	2.1

Table 4b below above shows Xcel’s 2024 service extension requests for locations previously served. Xcel provided the number of installations for locations previously served which includes Cold Weather Rule reconnections. The number of installs in 2024 is down from the five-year average for both residential and commercial residents. The average days to complete reconnection for residential customers is up from the five-year average whereas the average days to complete reconnection for commercial customers is consistent with the five-year average.

The Department concludes that Xcel met the service extension request reporting requirements in 2024.

*B.5. Customer Deposits*

The Commission issued an Order on December 22, 2023 to update the reporting requirements for customer deposits.<sup>32</sup> Gas utilities are required to report on customer deposits within their annual service quality reports whenever their deposit collection policies change.

These reports shall include a description of the previous deposit collection policy, a description of the new deposit collection policy, the reason for

<sup>29</sup> Petition at Attachment E.

<sup>30</sup> *Id.*, at 8.

<sup>31</sup> *Id.*, at Attachment E.

<sup>32</sup> December 22, 2023 Order, at 6.

the policy change, and data from the previous three years regarding the number of customers who were required to make a deposit as a condition of receiving service and the total number of deposits held at the end of each year.<sup>33</sup>

Xcel requires a deposit upon receipt of notice from the bankruptcy court and/or the customer regarding the filing of a bankruptcy petition. Deposits are not required for the reconnection of service. Upon the filing of a bankruptcy petition, the company treats the account as a new service and includes the required deposit on the customer's initial post-petition bill. Xcel made no changes to its deposit policy in 2024.<sup>34</sup>

The Department concludes that Xcel met the customer deposit reporting requirements for 2024.

#### *B.6. Customer Complaints*

As stated in Minnesota Rules 7826.2000 and 7820.0500, gas utilities that report customer complaints must include the following information, organized by customer class and calendar month:

- The number of complaints received;
- The number and percentage of complaints alleging billing errors, inaccurate metering, wrongful disconnection, high bills, inadequate service, and the number involving service-extension intervals, service-restoration intervals, and any other identifiable subject matter involved in 5% or more of customer complaints;
- The number and percentage of complaints resolved upon initial inquiry, within 10 days, and longer than 10 days;
- The number and percentage of complaints resolved by taking: the action the customer requested, a mutually agreed upon compromise, providing the customer with information that demonstrates the grieved situation is not within the utility's control, or refusing to take the action requested by the customer; and
- The number of complaints forwarded to the utility by the Commission's Consumer Affairs Office (CAO) for further investigation and action.<sup>35</sup>

Utilities are required to provide additional information as noted in Minnesota Rules 7820.0500.<sup>36</sup>

Table 5a below provides detail on customer complaint handled by Xcel's Customer Advocate Group (CAG). In 2024, the CAG handled 1,981 electric and natural gas complaints. 1,486 of those complaints were forwarded by the Commission's CAO.

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<sup>33</sup> *Id.*, at 17.

<sup>34</sup> Petition, at 8.

<sup>35</sup> Minn. R. [7826.2000](#) and [7820.0500](#).

<sup>36</sup> Minn. R. [7820.0500](#).

**Table 5a: Customer Complaints Handled by CAG (2015-2024)<sup>37</sup>**

Year	# Handled by CAG	# Forwarded by CAO	% Resolved on Initial Inquiry	% Resolved by Taking Customer-Requested Action	Top Complaint Category
2015	789	129	14.3%	51.3%	Inadequate Service
2016	547	102	16.3%	29.5%	Inadequate Service
2017	572	113	18.0%	27.1%	Inadequate Service
2018	664	248	20.6%	26.7%	Inadequate Service
2019	756	390	14.0%	26.7%	Inadequate Service
2020	430	239	14.4%	35.8%	Inadequate Service
2021	484	257	10.7%	31.6%	Inadequate Service
2022	635	330	9.1%	32.0%	Inadequate Service
2023	1,223	759	3.3%	11.5%	Billing Errors
2024	1,981	1,468	5.2%	10.2%	Inadequate Service
<b>10-Year Avg.</b>	<b>808</b>	<b>404</b>	<b>12.6%</b>	<b>28.2%</b>	

Table 5b below summarizes Xcel’s call center complaints. In 2024, Xcel received 42,058 customer complaints and approximately 97% of these complaints were resolved by taking the action the customer requested, consistent with the ten-year average.

**Table 5b: Customer Complaints Handled by Xcel’s Call Centers<sup>38</sup>**

Year	# Handled by Xcel’s Call Centers	% Resolved by Taking Customer Action	Top Complaint Category
2015	797,237	96%	Billing Errors
2016	736,308	97%	Billing Errors
2017	665,739	96%	Billing Errors
2018	624,399	98%	Billing Errors
2019	550,343	99%	Billing Errors
2020	285,557	99%	Billing Errors
2021	34,346	96%	Billing Errors
2022	22,792	94%	Inadequate Service
2023	33,752	97%	Inadequate Service
2024	42,058	97%	Inadequate Service
<b>10-Year Avg.</b>	<b>379,253</b>	<b>97%</b>	

The call count dropped significantly in 2021 and remained below the historic average through 2024. However, the overall 2024 call volume increased in comparison to 2023. The number of complaints handled by the Customer Advocates and forwarded by the Commission’s CAO also increased

<sup>37</sup> Petition, at Attachment F.

<sup>38</sup> *Id.*, at Attachment F-6.

significantly from 2023 to 2024. Between 2022 and 2024, the number of complaints submitted to the CAO grew by 344.85%, with an increase from 330 in 2022 to 1,486 in 2024. Xcel stated that disconnections represented the most common type of complaint in 2024. The Company attributed the rise in disconnection complaints to economic conditions such as inflation.<sup>39</sup>

Xcel provided the contact information for personnel designated to receive and respond to the requests and directives of the Commission regarding customer inquiries, service requests, and complaints.<sup>40</sup>

The Department concludes Xcel has met the customer complaint reporting requirements for 2024.

*B.7. Gas Emergency Phone Line Answer Time*

Xcel is required to report telephone answer times to the utility’s gas emergency phone line and the average number of minutes it takes to respond to an emergency.<sup>41</sup>

**Table 6: Gas Emergency Calls<sup>42</sup>**

Year	# of Gas Emergency Calls	Average Response Time (seconds)	# of Gas Emergency Line Calls	Average Response Time (seconds)
2015	29,064	14	18,567	14
2016	35,921	11	7,146	14
2017	43,037	7	6,995	12
2018	44,303	5	6,698	12
2019	43,204	4	8,078	8
2020	33,349	6	6,636	9
2021	32,561	5	5,449	7
2022	37,357	7	6,195	11
2023	36,124	7	6,298	10
2024	40,222	8	6,658	11
<b>5-Year Avg.</b>	<b>35,923</b>	<b>7</b>	<b>6,247</b>	<b>10</b>

The lowest performing months for average answer time of the gas emergency phone line in 2024 were July and August at 11 seconds. The average response time for gas emergency calls in 2024 is consistent with the five-year average.

The Department concludes the Company has met the gas emergency phone call reporting requirements for 2024.

<sup>39</sup> *Id.*, at 10.

<sup>40</sup> *Id.*, at Attachment F-1.

<sup>41</sup> August 26, 2010 Order, at 5.

<sup>42</sup> Petition at Attachment G.

*B.8. Gas Emergency Response Times*

In compliance with Commission Order, Xcel reports information on its response time to gas emergencies. Xcel is required to report on the percentage of emergencies responded to within one hour and within more than one hour as well as the average number of minutes it takes to respond to an emergency.<sup>43</sup>

**Table 7: Gas Emergency Response Time for Xcel<sup>44</sup>**

<b>Year</b>	<b># of Gas Emergency Calls</b>	<b>Average Response Time (seconds)</b>	<b>% of Calls Answered in an Hours or Less</b>
2015	13,587	38.13	87%
2016	12,811	36.82	88%
2017	13,230	38.35	87%
2018	13,500	35.92	92%
2019	15,238	40.11	92%
2020	12,756	33.47	96%
2021	11,965	28.68	97%
2022	13,063	28.09	97%
2023	13,557	29.01	97%
2024	14,019	28.13	98%
<b>5-Year Avg.</b>	<b>13,072</b>	<b>29.48</b>	<b>96%</b>

As indicated in Table 7 above, the average response time of 28.13 seconds for 2024 is consistent with the five-year average. The percent of calls answered in an hour or less in 2024 (98%) is higher than the five-year average (96%). The total number of gas emergency calls in 2024 is 14,019 calls, which is also higher than the five-year average.

The Department concludes that Xcel met the gas emergency response reporting requirements for 2024.

*B.9. Excavation Damages*

All gas utilities are required to report on the following metrics for excavation damage:

- The number of excavation tickets received;
- The number of excavation damages;
- The number of excavation damages per 1,000 excavation tickets; and
- The number of at fault damages.<sup>45</sup>

Xcel indicated that the information from subparts a, b, and d can be found in Attachment A, the appended PHMSA report. The Company reported 1.5 excavation damages per 1,000 excavation tickets.<sup>46</sup>

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<sup>43</sup> August 26, 2010 Order, at 7.

<sup>44</sup> Petition, at Attachment H.

<sup>45</sup> February 2, 2024 Order, at 7.

<sup>46</sup> Petition, at 11.

**Table 8a: Xcel Excavation Damages<sup>47</sup>**

Year	# of Excavation Tickets	# of Excavation Damages	Damages per 1,000 Tickets	% at Fault Damages
2020	207,803	379	1.82	22%
2021	204,603	310 <sup>48</sup>	1.52	21%
2022	193,202	323	1.67	22%
2023	198,447	317	1.60	20%
2024	205,345	310	1.51	20%
<b>5-Year Avg.</b>	<b>201,880</b>	<b>317</b>	<b>1.62</b>	<b>21%</b>

The number of excavation tickets in 2024 is consistent with the five-year average. Damages per 1,000 tickets is at a five-year low of 1.51 in 2024. The percent of fault damages in 2024 was 20% which is consistent with the five-year average.

Table 8b below summarizes data provided by Xcel in Attachment A, which includes a high-level summary of the causes of excavation damage.

**Table 8b: Root Cause of Excavation Damage (2024)<sup>49</sup>**

Root Cause	Incident		
	2024 Count	2024 %	Five-Year Avg. %
Excavation Practices Not Sufficient	137	44.2%	47.2%
One Call Notification Practices Not Sufficient	109	35.2%	31.3%
Locating Practices Not Sufficient	63	20.3%	21.2%
<b>Total</b>	<b>309</b>		

Xcel reported that in 2024, 44.2% of excavation damages resulted from inadequate excavation practices. The total number of insufficient excavation practices was 137 in 2024, which is a decrease from 174 in 2023. However, the number of insufficient one-call notification practices increased to 109 in 2024, compared to 80 in 2023.<sup>50</sup> The highest reported notification issue category involved failure to notify the One-Call Center/811.<sup>51</sup> Excavation damages attributed to insufficient locating practices (at fault damages) accounted for 20.3%, which is consistent with the five-year average. Insufficient practices remain the leading root cause of excavation damages over the past five years.

The Department concludes the Company met the excavation damage reporting requirements for 2024.

*B.10. Service Interruptions*

<sup>47</sup> *Id.*, at Attachment A.

<sup>48</sup> *In the Matter of Northern States Power Company's Annual Report on Natural Gas Service Quality for 2023*, Xcel Energy, Errata, August 30, 2024, Docket No. G002/M-24-31 (eDockets) [20248-209906-02](#), at 3.

<sup>49</sup> Petition, at Attachment A at 3.

<sup>50</sup> 2023 Petition, at Attachment A at 3.

<sup>51</sup> Petition, at Attachment A at 3.

Xcel is required to report the number of service interruptions categorized according to whether it was caused by the utility’s employees or contractors, or whether it was due to any unplanned cause.<sup>52</sup>

**Table 9: Gas Service Interruption<sup>53</sup>**

Year	Number of Homes Affected	Number of Incidents Caused by Xcel	Average Duration of Outages Cause by Xcel (hours: minutes)	Number of Incidents Caused by Others	Average Duration of Outages Caused by Others (hours: minutes)
2015	715	32	1:55	263	1:57
2016	606	25	1:34	252	1:50
2017	401	19	0:58	161	1:39
2018	942	30	1:35	179	1:58
2019	3,465	19	1:29	126	1:58
2020	3,741	18	2:11	128	1:36
2021	509	22	2:05	59	2:02
2022	1,307	13	4:48	5	1:24
2023	435	2	6:30	4	4:15
2024	604	14	8:00	0	0
<b>5-Year Avg.</b>	<b>834.40</b>	<b>13.80</b>	<b>4.42</b>	<b>1130.80</b>	<b>2:13</b>

Table 9 above summarizes the gas interruption data in 2024 provided by Xcel. The number of homes affected by interruptions was up in 2024 (604) compared to 2023 (435). The total number of incidents caused by Xcel increased in 2024 (14) and is consistent with the five-year average. Xcel reported that there were no gas service interruption incidents caused by others.

Xcel stated that the number of outages can vary depending on the season, and variability in the number of homes impacted by an incident. The key factors that influence variability include public safety and the type, size, and system operating pressure.<sup>54</sup>

The Department concludes that Xcel met the service interruption reporting requirements for 2024.

*B.11. Major Incident Reporting*

Gas utilities are required to provide a summary of major events that are immediately reportable to the Minnesota Office of Pipeline Safety (MNOPS) according to the criteria used by MNOPS to identify reportable events. The summary shall include:

- The location;
- When the incident occurred;
- How many customers were affected;

<sup>52</sup> August 26, 2010 Order, at 7.

<sup>53</sup> Petition, at Attachment I.

<sup>54</sup> *Id.*, at 11- 12.

- How the company was made aware of the incident;
- The root cause of the incident;
- The actions taken to fix the problem;
- What actions were taken to contact customers;
- Any public relations or media issues;
- Whether the customer or the company relighted; and
- The longest any customer was without gas service during the incident.<sup>55</sup>

#### *B.11.1. Major Incident Reporting*

In 2024, Xcel reported 14 major incidents.<sup>56</sup> Over the past five years, Xcel reported an average of 21 major incidents, which is greater than the number of incidents reported in 2024. In all fourteen incidents, the area was secured and the main repaired to fix the issue.

#### *B.11.2. MnOps Emergency Response Violations & Violation Letters*

Xcel received 36 MnOps violation letters.<sup>57</sup> Over the last five years (2020-2024), Xcel received an average of 19.8 violation letters. The number of violation letters received in 2024 marks the highest count within the last five years. In Attachment K, Xcel provides a summary of the incidents that result in MnOps violation letters, including citation codes and remediations.

The Department concludes that the Company met the required major incident, MnOps emergency response violations and MnOps violation letter reporting requirements for 2024.

#### *B.12. Integrity Management Plan Reporting*

As part of the Annual Report, Xcel is required to include its United States Department of Transportation, Pipeline and Hazardous Materials Safety Administration (PHMSA) Gas Distribution System Annual Report for 2024.<sup>58</sup> Table 10 below provides a summary of the hazardous leaks eliminated and repaired as indicated in Attachment A of Xcel's annual report.

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<sup>55</sup> August 26, 2010 Order, at 8.

<sup>56</sup> Petition, at Attachment J.

<sup>57</sup> *Id.*, at 14.

<sup>58</sup> December 22, 2023 Order, at 8-9.

**Table 10: Hazardous Leaks Eliminated/Repaired, 5-Year Average and 2024 Counts<sup>59</sup>**

Leak Cause	Main Leaks		Service Leaks	
	5-Year Average (2020-2024)	2024	5-Year Average (2020-2024)	2024
Corrosion Failure	0.2	0	38.0	43
Natural Force Damage	5.4	4	33.4	43
Excavation Damage	66.8	63	244.8	222
Other Outside Force	5.0	5	35.2	26
Pipe, Weld, Joint	9.8	7	46.0	39
Equipment Failure	4.4	6	86.6	90
Incorrect Operation	0.2	0	0.8	1
Other Cause	11.2	12	61.6	51
<b>Hazardous Leak Count</b>	<b>103.0</b>	<b>97</b>	<b>546.4</b>	<b>515</b>
<b>All Leak Total</b>	<b>206.2</b>	<b>284</b>	<b>1,423.2</b>	<b>1,603</b>
<b>% of Leaks that were Hazardous</b>	<b>50%</b>	<b>34.2%</b>	<b>38.4%</b>	<b>32.1%</b>
Leaks Per 1,000 Miles of Main or 1,000 Services	21.26	28.86	3.11	3.44

In 2024, Xcel had 9,840 miles of distribution main in the system, 92% of which is plastic PE (polyethylene). The number of miles of distribution main is up from a five-year average of 9,698.3 miles.

Equipment failure and excavation damage were the leading causes of all main leaks (22% and 60% respectively) in 2024. Excavation damage and other causes were the leading causes of hazardous main leaks (65% and 12% respectively). For service leaks, equipment failure caused 43% of all service leaks and 17% of hazardous service leaks. Excavation damage was the leading cause of hazardous service leaks, making up 43% of hazardous services leaks in 2024, which is consistent with the five-year average.

The leaks per 1,000 miles of main and leaks per 1,000 services is up in 2024 compared to the five-year average as is the total leak count. The percent of leaks that were hazardous (for both mains and services) is down in 2024 compared to the five-year average.

The percent of unaccounted for gas in 2024 is a five-year low of 1.2%. The five-year average of unaccounted for gas is 2.15%.

The Department concludes that the Company provided the required Integrity Management Plan Reporting from their Annual PHMSA Distribution Report.

<sup>59</sup> Petition, at Attachment A, at 2- 3.

*B.13. EFV and Manual Shut-Off Valves*

In its December 26, 2024 Order, the Commission found that Xcel “completed its excess flow valve (EFV) and manual shutoff valve outreach pursuant to the Commission’s July 31, 2019 order in the G-999/CI-18-41 docket.”<sup>60</sup> At Order Point 5, the Commission “approved Xcel’s request to cease reporting on EFVs, manual shut-offs valves, and related outreach.”<sup>61</sup> Therefore, Xcel submitted its PHMSA report without EFV and manual shut-off valve data as the information is no longer a reporting requirement.

*B.14. Web-Based Metrics*

In compliance with the December 22, 2023 Order, gas utilities must report the following web-based metrics starting in 2025 with the 2024 annual report:

- The percentage of uptime of the utility’s enterprise-wide website;
- The percentage of uptime for web payment services ability;
- The error rate percentage for the utility-based payment services;
- The yearly total number of website visits to initial facing enterprise-wide website; and
- The yearly number of logins via electronic customer communication platforms.<sup>62</sup>

**Table 11: Web-Based Metrics (2024)<sup>63</sup>**

<b>Percentage Uptime</b>		<b>2024</b>
	General Website	100.00%
	Payment Services	99.45%
Error Rate Percentage	Payment Services	0.116%
Website Visits	Facebook, Twitter, XcelEnergy.com	11,890,711
Logins via electronic customer communication platforms	My Account, Mobile App	13,585,218

Table 11 above summarizes Xcel’s web-based metrics. The reported metrics may not reflect state-specific data as indicated in the December 22, 2023 Order.<sup>64</sup> The 2024 report is the first year Xcel reported web-based metrics therefore there is no historical data available.

The Department concludes that for 2024, Xcel has provided the required reporting for web-based metrics.

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<sup>60</sup> *In the Matter of Northern States Power Co. d/b/a Xcel Energy’s Service Quality Report, Order*, December 26, 2024, Docket No. G002/M-24-31, (eDockets) [202412-213330-01](#), at 1.

<sup>61</sup> *Ibid.*

<sup>62</sup> December 22, 2023 Order, at 16.

<sup>63</sup> Petition, at 15.

<sup>64</sup> February 2, 2024 Order, at 9.

*B.15. Xcel-Specific Reporting: Meter Equipment Malfunction (Field Orders)*

In addition to the metrics that are reported by all gas utilities, Xcel is required to report on meter equipment malfunctions (field orders). Xcel shall report:

- Volume of investigation and Remediate;
- Volume of investigate and refer;
- Volume of remediate upon referral field orders;
- Average response time for each of the above categories by month and year;
- Minimum days, maximum days, and standard deviation for each category; and
- Volume of excluded field orders.<sup>65</sup>

*B.15.1. Required Meter Equipment Malfunction Data*

The Department provides a summary of the gas meter equipment malfunction data reported in Attachment L-1 along with a comparison to five-year averages (2020-2024) below.

**Table 12: Gas Meter Equipment Malfunction Orders (2024)<sup>66</sup>**

	2024			Five-Year Avg.		Avg. Response Target <sup>67</sup> in Avg. Days
	Count	% of Orders	Avg. Days	% of Orders	Avg. Days	
Investigate & Remediate Orders	2,315	85.3%	15.46	75.2%	7.72	9
Investigate & Refer Orders	312	11.5%	15.03	15.6%	7.24	9
Remediate Upon Referral Orders	87	3.2%	8.69	9.3%	16.32	15
<b>Total Gas Orders</b>	<b>2,714</b>		<b>13.06</b>	<b>Count: 3,896</b>	<b>8.37</b>	

The number of gas orders in 2024 was below the five-year average and the average days to address increased for two of the three solution types. While the average days to respond went up in 2024, they were below the average response targets established in the Natural Gas Rate Book.

The Department concludes that for 2024, Xcel has provided the required meter equipment malfunction reporting.

<sup>65</sup> *Id.*, at 10.

<sup>66</sup> Petition, at Attachment L-1.

<sup>67</sup> The average annual response targets are set in the [Natural Gas Rate Book Section 6](#), Sheet 13.1.

#### **IV. DEPARTMENT RECOMMENDATIONS**

Based on analysis of Xcel's 2024 Annual Natural Gas Service Quality Report, the Department has prepared recommendations, which are provided below. The recommendations correspond to the subheadings of Section III above.

*A. RESPONSE TO NOTICE TOPICS*

- A.1. The Department recommends that the Commission accept Xcel's 2024 Annual Natural Gas Service Quality Report.

*B. REPORT ANALYSIS*

- B. 1. The Department requests that Xcel clarify, in reply comments, how the Company plans to meet the call center response time requirement in the future.

## Attachments

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

Xcel Energy Information Request No. 1  
Docket No.: G002/M-25-31  
Response To: Minnesota Department of Commerce  
Requestor: Krystal Binversie  
Date Received: August 07, 2025

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Question:

Topic: AMR Meters

Reference(s): Petition pages 3-5 and Attachment C

1. What ratio of Xcel meters are equipped with Automated Meter Reading (AMR)?
2. What percent of reads in 2024 were done via the AMR system?

Response:

1. 99.66 percent of meters were equipped with AMR reading equipment at the end of 2024, including Cellnet, electric AMI meters and gas meters equipped with communication modules to enable drive-by meter reads.
  2. 99.30 percent of all actual reads were attained by AMR systems in 2024.
- 

Preparer: Cory R. Trusty  
Title: Performance Analyst  
Department: Meter Reading Support  
Telephone: 715-737-7038  
Date: August 18, 2025

## **CERTIFICATE OF SERVICE**

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce**  
**Comments**

**Docket No. G002/M-25-31**

Dated this **23<sup>rd</sup>** day of **September 2025**

**/s/Sharon Ferguson**

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission		Electronic Service		No	M-25-31
2	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-25-31
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	M-25-31
4	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St. Louis MO, 63119-2044 United States	Electronic Service		No	M-25-31
5	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	M-25-31
6	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	M-25-31
7	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	M-25-31
8	Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP		Suite 1750 220 South Sixth Street Minneapolis MN, 55402-1425 United States	Electronic Service		No	M-25-31
9	Annete	Henkel	mui@mnuutilityinvestors.org	Minnesota Utility Investors		413 Wacouta Street #230 St. Paul MN, 55101 United States	Electronic Service		No	M-25-31
10	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	M-25-31
11	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-31
12	Sarah	Johnson Phillips	siphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-31
13	Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.		8300 Norman Center Drive Suite 1000 Bloomington MN, 55437 United States	Electronic Service		No	M-25-31
14	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA	Electronic Service		Yes	M-25-31

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Minneapolis MN, 55401 United States				
15	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	M-25-31
16	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-31
17	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-31
18	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	M-25-31
19	James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-31