

STATE OF MINNESOTA
BEFORE THE
PUBLIC UTILITIES COMMISSION

Katie Sieben
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Chair
Commissioner
Commissioner
Commissioner
Commissioner

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 Originally Established in
Docket No. E, G-02/CI-02-2034 & Investigation
and Audit of Service Quality Reporting-Fraud
wise Report

DOCKET NO. CI-02-2034

DOCKET NO. M-12-383

**REPLY COMMENTS OF THE INTERSTATE RENEWABLE ENERGY COUNCIL,
INC., FRESH ENERGY, THE ENVIRONMENTAL LAW & POLICY CENTER, AND
VOTE SOLAR ON XCEL ENERGY'S ANNUAL REPORT AND REQUEST FOR
COMMISSION FINDING REGARDING THE CUSTOMER COMPLAINT
PERFORMANCE SERVICE QUALITY PLAN**

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I. Introduction

The Interstate Renewable Energy Council, Inc. (“IREC”), Fresh Energy, the Environmental Law & Policy Center (“ELPC”), and Vote Solar submit these reply comments on the Petition of Xcel Energy (“Xcel”) requesting that the Commission find that 129 customer complaints should not be counted in the Customer Complaints metric of Xcel’s Quality of Service Plan (“QSP”). In addition to our initial comments filed on July 1, 2020, the Commission received comments on this issue from the City of Minneapolis, the Minnesota Solar Energy Industries Association (“MnSEIA”), two solar companies installing small solar projects (All Energy Solar and Novel Energy Solutions), and the Department of Commerce. In particular, we and other commenters emphasized that the complaints filed by the solar installers meet the definition of “customer complaint” under Xcel’s QSP and thus must be counted when assessing Xcel’s performance under the QSP tariff.¹ Further, all commenting parties urged the Commission to ensure that Xcel is held accountable for its failure to comply with the Minnesota Distributed Energy Resources Interconnection Process (“MN DIP”), suggesting a variety of ways to achieve this.

¹ MN Pub. Util. Comm., Dkt. E,G002/M-12-383, 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 (“Dkt. E,G002/M-12-383”) & Dkt. E,G002/M-02-2034, In the Matter of an Investigation and Audit of Northern States Power Company’s Service Quality Reporting (“Dkt. E,G002/CI-02-2034”), Initial Comments of the Interstate Renewable Energy Council, Inc., Fresh Energy, the Environmental Law & Policy Center, and Vote Solar on Xcel Energy’s Annual Report and Request for Commission Finding Regarding the Customer Complaint Performance Service Quality Plan, pp. 11-15 (July 1, 2020) (“Joint Nonprofit Comments”); Dkts E,G002/M-12-383 & E,G002/CI-02-2034, Minnesota Solar Energy Industries Association’s (MnSEIA) Comments, pp. 3-4 (July 1, 2020) (“MnSEIA Comments”); Dkts E,G002/M-12-383 & E,G002/CI-02-2034, Comments of the City of Minneapolis, pp. 2-3 (July 1, 2020) (“Minneapolis Comments”).

The Department of Commerce, however, was the only commenting party to suggest that the complaints submitted to the Consumer Affairs Office (“CAO”) on behalf of Xcel’s customers do not actually meet the definition of “customer complaint” under Xcel’s Quality of Service Plan (“QSP”). The Department’s position was based on an erroneous interpretation of the QSP tariff’s language and added a nonexistent requirement that a customer seeking to install solar must suffer financial harm before a solar installer could submit a complaint on their behalf. As explained below, this goes against the plain language of the QSP tariff and would unfairly treat solar customers differently than all other Xcel customers. Further, it would create an unworkable and unprecedented system requiring the CAO to investigate and adjudicate each and every complaint before counting it against Xcel’s QSP.

For the reasons explained below, the Commission should not allow for such discriminatory treatment of customers who seek to install solar systems. Instead, the Commission should ensure that—just like any other utility customer—solar customers are able to expect quality customer service from Xcel, that Xcel will comply with its tariffs, and that Xcel will be held accountable for its actions when it does not meet the expectations the Commission has set for it.

II. There is no dispute regarding the facts of the problem.

Everyone agrees on the facts underlying this issue. Since it began operating under the new MN DIP in June 2019, Xcel has consistently failed to process customers’ solar interconnection applications within the time provided under the MN DIP. As the Department of Commerce put it, simply, Xcel has “botched” the process.² Solar installer and solar industry

² Dkts E,G002/M-12-383 & E,G002/CI-02-2034, Comments of the Minnesota Department of Commerce, Division of Energy Resources, p. 7 (July 2, 2020) (“DOC Comments”).

representative comments in this docket emphasize this point, describing myriad delays and other problems with Xcel’s MN DIP process, including delayed meter installation, engineering delays, extensive problems with Xcel’s online portal, inflexibility on scheduling witness tests, miscommunication, lack of communication and placing projects on indefinite “hold.”³ Even Xcel admits that it failed in this regard, revealing in its Petition that it did not send Permission to Operate (“PTO”) letters on time, did not to provide meters on time (due to portal issues), and did not meet engineering deadlines.⁴ Xcel’s compliance filing in the interconnection dockets confirms the issue, documenting that Xcel missed deadlines for 22 percent of simplified process applications, that some delays were caused by problems with its portal, that PTO letters were not issued correctly, and that there were delays with meter orders.⁵

In the face of these unrelenting delays—which, as explained in more detail below, have had real, financial impacts for Xcel’s customers—one installer, All Energy Solar, turned to the Department of Commerce for guidance and was directed to file its complaints with the Consumer Affairs Office (“CAO”).⁶ After months more of repeated attempts to resolve issues with Xcel, All Energy finally submitted its 128 individual complaints to the CAO in December 2019, as

³ MnSEIA Comments, pp. 7, 10-13; Dkts E,G002/M-12-383 & E,G002/CI-02-2034, Comments of All Energy Solar, p. 2 (July 1, 2020) (“All Energy Comments”); Dkts E,G002/M-12-383 & E,G002/CI-02-2034, Comments of Novel Energy Solutions, pp. 2-4 (July 1, 2020) (“Novel Energy Comments”).

⁴ Dkts E,G002/M-12-383 & E,G002/CI-02-2034, Annual Report and Request for Commission Finding Regarding the Customer Complaint Quality Plan, pp. 10-12 (May 1, 2020) (“Petition”).

⁵ MN Pub. Util. Comm., Dkt. E999/CI-01-1023, In the Matter of Establishing Generic Standards for Utility Tariffs for Interconnection and Operation of Distributed Generation Facilities Under Minn. Laws 2001, Ch. 212 & Dkt. E999/CI-16-521, In the Matter of Updating the Generic Standards for the Interconnection and Operation of Distributed Generation Facilities Established Under Minn. Stat. § 216B.1611, Xcel Energy Compliance Filing – 2019 Interconnections, pp. 7, 9-10 (Mar. 2, 2020).

⁶ See All Energy Comments, p. 1.

directed to do by the Department of Commerce, in the hopes that the problems would finally be resolved.⁷ These complaints were counted by the CAO as part of Xcel's QSP, and Xcel petitioned the Commission that they not be.⁸

III. Solar customers are customers and should receive the same treatment as any other customer, including allowing their representatives to submit complaints on their behalf.

A key issue that the Commission must grapple with here is whether solar customers should be treated the same as the utility's other customers. The answer should be yes. If solar customers' complaints are not counted here, as Xcel requests and DOC suggests is appropriate, solar customers will be treated differently from all other electric customers and be forced to expect a lower quality of customer service from the utility regarding their electrical service, of which their solar installation is an essential component.

As we explained in our initial comments, the 129 solar customer complaints about Xcel's provision of service to them are properly counted as part of Xcel's QSP.⁹ The QSP counts complaints that are "related to [Xcel's] provision of service" to customers, including complaints about billing and credit, meter reading, customer service, and other similar issues.¹⁰ It does not exclude any type of service complaint, including complaints regarding the solar interconnection process.¹¹ Complainants are not required to demonstrate any violation of rule or law; rather, the QSP is a measure of customer satisfaction and experience.

⁷ *Id.*

⁸ *See* Petition, p. 18.

⁹ *See* Joint Nonprofit Comments, pp. 10-19.

¹⁰ Dkts. E,G002/M-12-383 & E,G002/CI-02-2034, Compliance Filing: QSP Tariff Modifications, Xcel Energy Rate Book, Section 6, Sheet 7.2 (Aug. 27, 2013) ("QSP Tariff").

¹¹ *See id.*

The validity of the complaints is not altered if they are submitted by a solar installer on behalf of the customers. The QSP allows customer complaints to be submitted by a representative of the utility's customer who is authorized to act on their behalf.¹² As we explained in our initial comments, solar installers are authorized by contract to act on the behalf of their customers in all aspects of the interconnection process, which must include complaints when the utility does not fulfill its obligations under the process.¹³ Indeed, the reason customers hire solar installers to represent them is so they do not have to go through the interconnection process themselves. And installers could lose their customers if they do not promptly address problems with the process, through complaints or other avenues. Moreover, if customers are informed that only they can submit complaints and then complain on issues that do not fully understand, that could result in even more complaints.¹⁴

This is the inequitable and unworkable approach that Xcel and the Department of Commerce suggest that the PUC take by carving solar customer complaints out of the QSP. While Xcel suggests the complaints should not be counted in part because they were not directly filed by the customer and “the customer did not experience any change in their electric service,”¹⁵ the Department suggests that a solar customer's representative should not be allowed to file a complaint unless it is established that the customer is suffering financial harm.¹⁶ As explained below, neither of these is the standard under the QSP.

¹² *Id.*

¹³ *See* Joint Nonprofit Comments, p. 14.

¹⁴ *See* MnSEIA Comments, pp. 5-6.

¹⁵ Petition, p. 16.

¹⁶ DOC Comments, p. 7.

In any case, there is no basis for discriminating against solar customers in this way by requiring a showing of harm or disruption of service before a representative can register on their behalf a complaint about the utility's provision of service regarding solar interconnection. And no other aspect of an electric customer's service is held to this standard. Imagine if electric customers were required to prove their lights had flickered to have their complaints counted. Or if customers had to somehow prove that they were treated improperly by an Xcel customer service representative, or prove that there were billing problems. This would significantly increase the burden on the CAO and Xcel's customers to satisfy the metric, and unsurprisingly, the Commission did not take such an approach with the QSP's customer complaint metric.

Finally, it bears repeating that solar customers are simply Xcel electric customers who have decided to add solar to their homes. They are not a wholly separate class of customer. They are everyday customers who rely on Xcel for provision of their electric service and who also have chosen to invest in their own clean energy systems. It would be indefensibly discriminatory to solar customers if they could not expect the same Commission-enforced high-quality service from Xcel regarding solar interconnection that the Commission requires Xcel provide for all other aspects of its electric service.

IV. The Department of Commerce misstates the standard for what is a customer complaint.

In its comments, the Department argues that solar customers should not be allowed to have complaints submitted to the CAO on their behalf unless "it can be shown that the [solar installer] is unambiguously lodging the complaint for the financial benefit of affected retail customers."¹⁷ Essentially, the Department argues that, for a solar customer's complaint that was

¹⁷ *Id.*

submitted by its representative installer to be counted, (1) the complaint must be investigated, and (2) the investigation must show that the customer was financially harmed by the actions being complained of. This is not the standard under the QSP, is unworkable, and would unjustifiably treat solar customers differently—and lesser—than any other utility customer complaining about a non-solar-related issue. The Department’s position is particularly concerning in light of its stated mission to “protect the public interest [and] advocate for Minnesota consumers.”¹⁸

First, the QSP does not require investigation of complaints for them to be counted. Xcel’s QSP defines “customer complaint” as “a complaint *submitted* by an Xcel Energy customer in which the customer states a grievance related to the Company’s provision of service to that customer.”¹⁹ It does not concern validated complaints, or adjudicated complaints, or complaints where actual harm—financial or otherwise—is alleged or proved. It simply counts complaints received. And this makes sense: the customer complaint metric is a measure of customer satisfaction, and thus the existence of a complaint alone is sufficient to “count” under this aspect of the QSP. Customers will likely use the timelines and process in the MN DIP as guidance for what is reasonable and what warrants a complaint. However, even that is not required for a complaint, and it is completely reasonable that customers could have complaints that are not tied to any specific violation of the DIP or other rules.

It is our understanding that the CAO does not investigate any complaints when deciding whether to count them as part of Xcel’s QSP. Indeed, it makes sense that it does not, because it would be burdensome and duplicative of other QSP standards to do so. For example, the QSP

¹⁸ See <https://mn.gov/commerce/about/>.

¹⁹ QSP Tariff, Xcel Energy Rate Book, Section 6, Sheet 7.2 (emphasis added).

tariff explicitly recognizes that customer complaints may include complaints regarding “reliability duration” and “reliability frequency.”²⁰ The QSP tariff separately holds Xcel to specific standards for electric reliability (SAIDI for average duration of interruptions, and SAIFI for average frequency of interruptions) based on actual measurements of Xcel’s electric service.²¹ These separate measures serve separate purposes: the SAIDI/SAIFI measure *actual* provision of service, while the customer complaints metric measures *customer satisfaction* with provision of service. To require validation of or otherwise adjudicate customer complaints would thus be duplicative of other metrics and eliminate the measure of customer satisfaction from the QSP. Further, requiring the CAO to investigate and validate every complaint before counting it would create a burdensome and uncertain process not contemplated by the QSP. If customers anticipated that their complaints were going to be rigorously adjudicated, they would be less likely to complain, and the Commission would lose visibility into this important customer service metric.

Second, the QSP tariff’s language clearly states that there is no requirement that a customer have suffered or be threatened with financial harm before a complaint can be submitted on that customer’s behalf. The language of the tariff is explicit on this point:

Customer Complaints

This metric **measures the number of Customer Complaints submitted** by the Commission’s Consumer Affairs Office. An under performance payment will be assessed in any year in which the number of complaints exceeds 0.2059 complaints per 1,000 customers.

Exclusions

Customer complaints will be recorded and reported with no exclusions. The Company may request exclusion of Customer Complaints that the Company can

²⁰ *Id.*

²¹ *See id.*, Section 6, Sheet 7.5; Petition, p. 6.

demonstrate are the result of an event beyond the Company's control, which the Company took reasonable steps to address.²²

The metric measures the number of complaints *submitted* – not the number verified, or adjudicated, or proven. And the tariff even goes on to say that no complaints will be excluded unless they are the result of an event “beyond the Company's control, which the Company took reasonable steps to address.” Execution of the MN DIP process is clearly directly within Xcel's control, and Xcel has not argued otherwise.

For these reasons, the Commission should reject the Department of Commerce's suggestion that solar installers cannot submit complaints on behalf of Xcel customers unless it can be shown that the complaint is for the “financial benefit” of the utility customer.²³

V. The Department of Commerce never investigated whether there was harm to customers from Xcel's delays.

It is particularly concerning that the Department of Commerce based its arguments on the premise that it could not “identify any potential financial harm to the affected customers or the [solar installer] vendor,”²⁴ but never actually asked customers or solar installers whether they suffered harm (and, as explained below, they did). Instead, the Department appears to have served information requests on only Xcel asking if *Xcel* was aware of any harm to customers or installers.²⁵ Unsurprisingly, Xcel responded that it did not know whether customers had been harmed: “[T]he Solar*Rewards program team has no record or recollection of any communication from any of these 129 customers showing that they have suffered financial

²² QSP Tariff, Xcel Energy Rate Book, Section 6, Sheet 7.7 (emphasis added).

²³ See DOC Comments, p. 7

²⁴ *Id.*

²⁵ See *id.*, pp. 4-7. To our knowledge, based on conversations with other parties in this docket, no affected solar installer or customer received similar information requests from the Department.

harm” (though it admitted financial harm could have been suffered).²⁶ Its response was the same regarding installers, noting that Xcel “do[es] not have access to the financials of the solar installers.”²⁷ This is unsurprising, as solar customers are more likely to complain to solar installers—who they are paying to manage the process for them—than they would be to complain to Xcel.

The Department admitted that the information requests submitted to Xcel were “unscientific.”²⁸ They are more than that: by seeking information only from Xcel, the Department lacked half of the story and abdicated its responsibility to look out for the best interests of the consumers it purports to protect. Indeed, as explained below and in other comments filed in this docket, both customers and solar installers suffered financial harm due to Xcel’s failure to comply with the MN DIP process.

VI. Customers were actually harmed by Xcel’s delays.

As explained above, no showing of harm is required for customer complaints submitted by solar installers to be counted. But even if this was the standard, it would be met here, and the complaints should be counted.

No one has disputed that Xcel’s actions resulted in interconnection delays. And as amply shown by evidence submitted in this docket, these delays have real financial impact on Xcel customers and solar installers alike. First and foremost, retail customers seeking to install solar suffer financial losses for each and every day Xcel delays connection of a solar system because each day of delay is a day that the customer is not getting the financial benefit of solar power to

²⁶ *Id.*, p. 4.

²⁷ *Id.*, p. 5.

²⁸ *Id.*, p. 7.

offset their energy costs.²⁹ Notably, these customers' losses become Xcel's gain, as it continues to reap the benefits of the customers paying for power drawn from the grid instead of generating their own.

Those customers also face loss of tax credits for solar, which are reduced annually. As explained in comments submitted in this docket, the step-down of the federal investment tax credit means customers whose projects are delayed into the next calendar year will end up paying more for their projects.³⁰ When solar installers do not take the financial hit on behalf of their customers, increased project costs are borne by the customers themselves. But Xcel would bear no financial impact for its own delays.

It is also worth noting that customers choose to invest in solar systems for many reasons beyond their direct financial benefit. Customers in Minnesota may also value solar's environmental benefits, a sense of energy independence, and other attributes. Customers are entitled to realize those benefits through the programs established by this Commission, and the Commission should be wary of the Department of Commerce's effort to boil solar customers interests down to such a simple metric as financial harm when considering whether customers are receiving the product they most desire from Xcel.

VII. Xcel's delays also harm solar installers by shifting the financial impacts of Xcel's delays from Xcel to installers.

In addition to the retail customers' losses, solar installers face significant financial impacts from Xcel's delays, which Xcel should be held accountable for. For example, one solar installer reported in its comments in this docket that Xcel's delays led to customers losing tax

²⁹ See MnSEIA Comments, Att. A.

³⁰ All Energy Comments, p. 2.

credits because the projects were not constructed in time.³¹ Because the installer had guaranteed the solar installation would be online in time to receive the tax credit—relying on the timelines in the MN DIP that Xcel was supposed to adhere to—the installer lost over \$150,000 that it paid to its customers as penalties, a significant percentage of which was directly caused by Xcel’s delays. It is problematic that Xcel can be the source of delays, but solar installers must bear the brunt of responding to and remedying customer dissatisfaction with the process.³²

Another installer explained that the months and years of delays caused by Xcel have resulted in financial losses, including lost interest on refundable deposits held by Xcel for extended periods during delays.³³ Specifically, this installer faces delays on over 90 percent of its projects under the MN DIP that are counted in months or years, not days or weeks.³⁴ Because of these delays, companies are facing financial stress that could lead to layoffs³⁵—especially concerning in light of the current economic climate and widespread unemployment.

Xcel’s delays have even caused solar installers to lose customers altogether. As one installer described, a customer canceled a contract for an application that was delayed in completion review and initial engineering review because the installer could not commit to an installation date due to Xcel’s repeated delays.³⁶

But Xcel now seeks to avoid paying any fine itself, despite the harm its delays have caused. The Commission should reject its request.

³¹ *Id.*

³² *See id.*; Novel Energy Comments, Exh. A at p. 2.

³³ Novel Energy Comments, p. 1.

³⁴ *Id.* at p. 2.

³⁵ *Id.* at p. 4.

³⁶ MnSEIA Comments, p. 10.

VIII. Xcel must be held accountable for its failures in implementing the MN DIP.

Every party commenting on this issue agrees that solar customer complaints must be tracked somehow, and every party but the Department of Commerce agrees that Xcel needs to be held accountable for its failures to comply with the MN DIP. And accountability is key here: as Xcel’s Petition itself evidences, financial penalties or some other strong accountability measure that could impact Xcel’s shareholders are the only ways to ensure Xcel actually complies with its obligations under the MN DIP. Allowing Xcel to merely “identify all of the steps it will take to prevent any similar reoccurrence”³⁷ is a free pass for Xcel’s bad behavior. And simply tracking complaints is insufficient; there must be an enforcement mechanism to hold Xcel accountable for its obligations under the MN DIP.

As we explained in our initial comments, the most straightforward way to hold Xcel accountable for customer service failures, including those related to the MN DIP, is to count the customer complaints at issue here under Xcel’s QSP. These complaints should—and similar complaints should continue to be—counted regardless of an investigation into or showing of financial harm or any specific violation. This is because, as explained above, *the QSP customer complaint metric is a measure of customer service and customer satisfaction*; adjudication is unnecessary, unwarranted, and counter to the intent of the measure. This would also ensure that Xcel has a financial incentive to provide adequate service to all of its customers, including meeting its obligations under the MN DIP.

Additionally, the Commission should establish a process to identify Xcel’s violations of the MN DIP and hold Xcel accountable for compliance with its procedures. This accountability mechanism should include a reporting and tracking MN DIP timeline compliance under the QSP,

³⁷ DOC Comments, p. 7.

with a corresponding penalty for noncompliance.³⁸ Similar to the QSP's SAIDI and SAIFI measures of actual electric system reliability, the QSP should track and enforce Xcel's actual compliance with the MN DIP timelines, separate from any metric related to customer complaints.

IX. Additional Topic for Comment: Should the issue of complaints about Xcel's compliance with the MN DIP be filed and addressed in another docket?

On July 15, 2020, the Commission added an additional topic for comment regarding whether the complaints should be reviewed in the docket established for Xcel's tariff filing (Docket No. E002/M-18-714). We answer no. It may be appropriate to move development of a solar-specific quality of service enforcement metric to another docket, or to consider the bigger picture of Xcel's compliance with the MN DIP in another docket, but the 129 complaints at issue here should be counted as customer complaints under Xcel's current QSP. As explained above, the plain language of the tariff requires that. Further, not counting the complaints now deprives the complaining customers of accountability under the existing process and leaves Xcel without an incentive to improve its customer service now.

X. Conclusion

The key point here is that *all* of Xcel's customers must have an avenue to register complaints about Xcel's provision of service regardless of the aspect of Xcel's service being complained of, and without the need for an investigation into how the customer was harmed, financially or otherwise. This is exactly the framework established by Xcel's QSP tariff, and this is the framework that should continue, without carving out subsets of customers (like solar

³⁸ See Joint Nonprofit Comments, p. 22.

customers) to be treated differently. The Commission should not entertain approaches that would allow discriminatory treatment of solar customers.

Additionally, we urge the Commission to take this opportunity to address Xcel's failure to adequately implement the MN DIP. As is clearly evidenced by the comments filed here, distributed energy customers are experiencing myriad problems with Xcel's interconnection process—problems not experienced with any other utility. This warrants the adoption of some sort of enforcement mechanism, such as a detailed reporting requirement accompanied by penalties for demonstrated noncompliance.

Ultimately, it is essential that the Commission provide the utility's customers—who cannot simply take their business elsewhere—with strong mechanisms to ensure that the utility provides the customers with the adequate service to which they are entitled. This can only be achieved by both counting all customers' complaints regarding Xcel's service under its current QSP, regardless of the underlying reason, and by the Commission independently enforcing Xcel's compliance with the MN DIP.

XI. Recommended Decision Options

1. Deny Xcel's Petition to not count as part of its QSP 129 complaints submitted to the CAO on behalf of Xcel customers seeking to install solar.
2. Count the 129 complaints filed with the CAO by solar installers in 2019 as part of Xcel's customer complaint QSP performance standard.
3. Continue to count complaints filed by or on behalf of solar customers as part of Xcel's QSP.
4. Create an accountability mechanism within the QSP for MN DIP compliance that includes robust reporting on compliance with timelines and a financial penalty for noncompliance.

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CERTIFICATE OF SERVICE

**DOCKET NO. M-12-383
DOCKET NO. CI-02-2034**

I, the undersigned, state that I am a citizen of the United States and am employed in the City and County of San Francisco; that I am over the age of eighteen (18) years and not a party to the within cause; and that my business address is 396 Hayes Street, San Francisco, CA 94102.

On August 10, 2020, I served a true and correct copy of

**REPLY COMMENTS OF THE INTERSTATE RENEWABLE ENERGY COUNCIL,
INC., FRESH ENERGY, THE ENVIRONMENTAL LAW & POLICY CENTER, AND
VOTE SOLAR ON XCEL ENERGY'S ANNUAL REPORT AND REQUEST FOR
COMMISSION FINDING REGARDING THE CUSTOMER COMPLAINT
PERFORMANCE SERVICE QUALITY PLAN**

on the parties in this action as follows:

SEE ATTACHED SERVICE LIST

BY ELECTRONIC FILING: I caused a copy of the document(s) to be sent to the e-mail addresses of the persons designated as accepting electronic service on the Official Service List by using the eService feature of the eFiling application of the Minnesota Public Utilities Commission.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed in San Francisco, California on August 10, 2020.

/s/ Jennifer Miao

Jennifer Miao

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_2-2034_1
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_2-2034_1
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	Yes	OFF_SL_2-2034_1
Susan	Medhaug	Susan.medhaug@state.mn.us	Department of Commerce	Suite 280, 85 Seventh Place East St. Paul, MN 551012198	Electronic Service	No	OFF_SL_2-2034_1
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_2-2034_1
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_2-2034_1
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	200 S 6th St Ste 470 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_2-2034_1
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_2-2034_1
Rebecca S.	Winegarden	beckwine@msn.com	Unknown	10555 Union Terrace Ln N Maple Grove, MN 553692622	Electronic Service	No	OFF_SL_2-2034_1

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michael	Allen	michael.allen@allenergysolar.com	All Energy Solar	721 W 26th st Suite 211 Minneapolis, Minnesota 55405	Electronic Service	No	OFF_SL_12-383_Official
Laura	Beaton	beaton@smwlaw.com	Shute, Mihaly & Weinberger LLP	396 Hayes Street San Francisco, CA 94102	Electronic Service	No	OFF_SL_12-383_Official
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_12-383_Official
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Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_12-383_Official
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Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_12-383_Official
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_12-383_Official
David	Shaffer	shaff081@gmail.com	Minnesota Solar Energy Industries Project	1005 Fairmount Ave Saint Paul, MN 55105	Electronic Service	No	OFF_SL_12-383_Official
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