



414 Nicollet Mall
Minneapolis, MN 55401

April 29, 2024

—Via Electronic Filing—

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

RE: EVALUATION METRICS DISCUSSION SUMMARY
IN THE MATTER OF NORTHERN STATES POWER COMPANY'S ANNUAL REPORT
ON SAFETY, RELIABILITY, AND SERVICE QUALITY FOR 2023
DOCKET NO. E002/M-24-27

IN THE MATTER OF A PETITION BY NORTHER STATES POWER COMPANY
REQUESTING APPROVAL OF CHANGES TO ITS TARIFF AN INDEFINITE
VARIANCE TO COMMISSION RULES REGARDING DISCONNECTION OF SERVICE
DOCKET NO. E002/M-22-233

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission (Commission) this Notice of Compliance to the Commission's March 22, 2023 Order, Order Points 5 and 6. Order Point 5(A-L) requires *additional Advanced Metering Infrastructure (AMI) related reporting in our Annual Service Quality for the reporting years of 2023, 2024, and 2025.*

Order Point 6 then requires that, "*Within 30 days of filing its 2023, 2024, and 2025 service quality reports, Xcel Energy shall engage stakeholders to discuss the evaluation metrics requirements established in this docket.*"

The Company held a stakeholder discussion in compliance with the Order Points described above on April 22, 2024.¹ A copy of the metric presentation is included as Attachment A to this filing. We provide a summary of the discussion below.

¹ Notice of the stakeholder discussion was served in both the Safety, Reliability and Service Quality Docket No. E002/M-24-27 and the AMI Variance Request Docket No. E002/M-22-233.

In the discussion, we addressed each of the established AMI related evaluation metrics reported in our 2023 Electric Safety, Reliability and Service Quality Annual Report, filed on April 1, 2024.² Participants were provided the opportunity for questions and input after each metric was presented. During the stakeholder discussion, one question was asked, requesting clarification on the percent of customers with an AMI meter and whether the disconnection notices information presented represented total customers or only customers with an AMI meter. Seven external participants attended the stakeholder discussion.

We have electronically filed this document with the Minnesota Public Utilities Commission and copies have been served on the parties on the attached service lists. Please contact Patti Leaf at patricia.b.leaf@xcelenergy.com or me at bridget.dockter@xcelenergy.com if you have any questions regarding this filing. We look forward to the discussion.

Sincerely,

/s/

BRIDGET DOCKTER
POLICY AND OUTREACH MANAGER

Enclosure
cc: Service Lists

² Docket No. E002/M-24-27.



**Electric Service Quality
AMI Reporting Metric Stakeholder Discussion
Docket No. E002/M-24-27
April 22, 2024**

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Welcome

- Today's Discussion complies with:

Docket No. E002/M-22-233; Disconnection of Service Order Point 6:

Within 30 days of filing 2023, 2024 and 2025 service quality reports, Xcel Energy shall engage stakeholders to discuss the evaluation metrics requirements established in this docket.

- We will be discussing each of the metrics
- Opportunity for input and questions
- We will be recording today's discussion
- 10- minute break

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Bridget Dockter

Policy and Outreach Manager

Stakeholder Discussion of Evaluation Metrics

Order Point (6) requires that:

Within 30 days of filing its 2023, 2024, and 2025 service quality reports, Xcel Energy shall engage stakeholders to discuss the evaluation metrics requirements established in this docket.

Evaluation Metrics Established in Docket No. 22-233, OP(5)

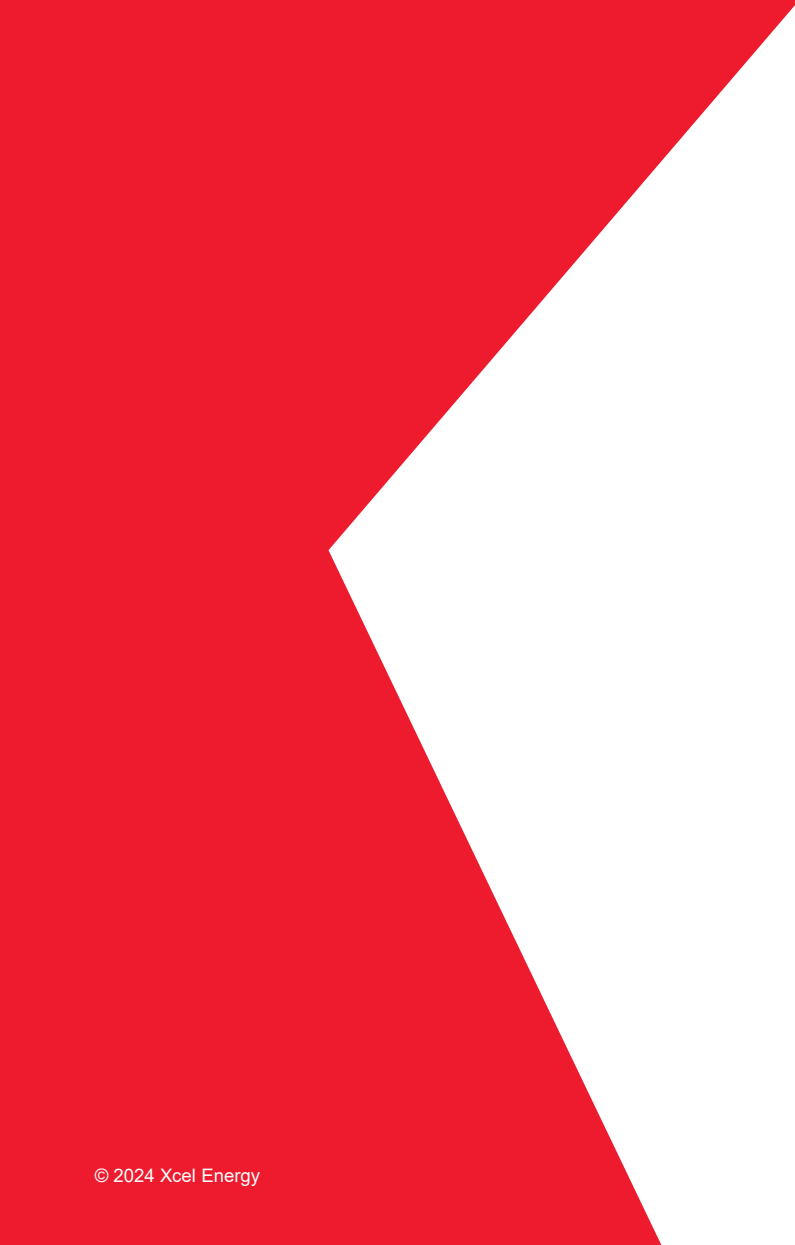
Xcel Energy shall file a report on the following evaluation metrics in its service quality reports for 2023, 2024, and 2025.

- A. AMI meter related complaints
- B. % of customers disconnected pre and post variance
- C. Field visits required when unable to reach the customer
- D. Time and method to reconnect customer
- E. Dis/Reconnect cost re-analysis for in person and remote
- F. Re-analysis & updated cost information
- G. Texting capability progress
- H. Progress adding a link to Med Cert.
- I. DOC, EA Unit feedback on remote disc.
- J. Compliance with Consumer Protections
- K. Customer Opt-out information
- L. AMI Extreme Heat Proposal

Consumer Protections, Order Point 5(J)

Referencing Order Point 4 (A-F); Compliance filed April 20, 2023

- A. Revise the form to include NP and PA's
- B. Remove specific check boxes and replace with broad impairment lang.
- C. Add an email address to allow medical professionals to the form.
- D. Provide a customer 30 calendar days to obtain certification.
- E. Meet with or present to organizations on the Medical Protection.
- F. Send additional information about our Medical registry to customers 1x year.



Questions?

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Bridget Dockter
Policy and Outreach Manager

Chris Barthol
Rate Consultant

A. Meter related complaints for advanced metering infrastructure.

The Company received nine meter-related complaints related to AMI Opt-Out in 2023. None of the nine complaints were related to customer concerns of disconnection or credit related activity.

Meter Related Complaints				
Customer Complaint Category	Opt-out charge Related	Specific Installation Concerns	Customer mistook opt-out meter for an AMI meter	Opt Out requested after AMI meter installed
	5	2	1	1

B. The percentage of customers flagged for disconnection who pay their disconnection amount in full in the current process versus after the variance has been implemented.

Table 8(b2)

Total and Percent 2023 Paid in Full

	January 1 - April 30*	May 1 - December 31**	Total
Disconnection Notices	165,870	330,027	495,897
Paid in Full	1,090	2,660	3,750
Percent of Disconnections Paid in Full	0.66	0.81	

*Period prior to field variance implementation

** Period after field variance implementation

C. The number of field visits required when the Company is unable to reach the customer (speaking to the customer or leaving a voicemail)

Prior to disconnection, weekly communications are provided to a customer over a 9-Week timeframe.

2023 Disconnection Orders Placed	Contact Made	Unable to Reach Via a Final Phone Call or Voice Mail
39,250	32,229	7,021
	82%	18%

D. The length of time for reconnecting each customer, and the method for reconnecting the customer.

RCD - Reconnection				
2023	Total	Avg Hrs.	Shortest	Longest
All	20,654	0.54	0	420.37
Residential	20,501	0.51	0	420.37
Commercial	104	0.74	0.01	26.6
Blank- No ID	49	13.04	0.01	138.67

Manual - Reconnection				
2023	Total	Avg Hrs.	Shortest	Longest
All	8,008	30.8	0	2091.06
Residential	7,726	29.53	0	2091.06
Commercial	280	64.99	0.27	1320.82
Blank- No ID	2	151.69	151.22	152.17

E. Re-analysis of actual costs for disconnection/reconnection requiring in-person visits and those performed remotely

F. Detailed cost information and subsequent analysis of costs as opposed to the Company's proposed language stating adjustments to costs can be following the first year of reporting.

Table 10*

Average Cost per Disconnect/Reconnect

	Remote Disconnect/Reconnect		Physical Disconnect/Reconnect	
	2022 Costs	Current Costs	2022 Costs	Current Costs
Pre Lock Call Cost	\$0.53	\$0.56	\$0.53	\$0.56
Post Lock Call Cost	\$3.74	\$3.95	\$3.74	\$3.95
Field Personnel Costs - Disconnects	\$8.46	\$13.84 \$14.76	\$59.75	\$97.77 \$104.28
Field Personnel Costs - Reconnects	\$1.08	\$2.93 \$1.88	\$35.85	\$97.77 \$62.57
Total Cost	\$13.80	\$21.28 \$21.15	\$99.87	\$200.04 \$171.36

*All costs include labor and benefits.

G. Progress exploring texting capabilities for customer contact and progress on an automated process for reconnection.

- The Company is working on an option that will allow customers communications regarding their disconnections and reconnections. This process is still in development currently.
- Work is underway to provide automated reconnection, but a specific timeline of implementation is yet to be determined.



H. Progress adding a direct link on its website to submit the Medically Necessary Equipment & Emergency Certification Form.

- The form is now available on our website and can be emailed or faxed into the Personal Accounts department.
- Our current website platform does not allow a “direct submit” option.

I. Feedback from the Department of Commerce, Energy Assistance Unit regarding remote disconnection.

The Department of Commerce, Energy Assistance Unit has indicated to us they do not have any feedback regarding the use of AMI for remote disconnection.





10 minute break



J. Compliance with all consumer protection measures ordered in this proceeding.

On April 20, 2023, the Company submitted the required consumer protection compliance filing for items 4 (A-F), in Docket No. E002/M-22-233.



4A. Revise the Company's Medically Necessary Equipment & Emergency Certification Form to include nurse practitioners and physician assistants who can provide certification.

Part B: Physician, Physican Assistant or Nurse Practitioner's information

Name _____ Date _____

Address _____ City _____ State _____ ZIP _____

Phone _____ License number _____

Physician, Physician Assistant or Nurse Practitioner's signature _____
(No stamped signatures)

4B. Remove the Medical Verification check boxes from the form and replace them with broad language that recognizes that cognitive impairments may qualify as a medical emergency under the statute.

Check boxes have been replaced with broad language that allows medical professionals to approve any medical condition without the need to state the specific impairment or condition.

Part B: Patient information (To be completed by Physician, Physician Assistant or Nurse Practitioner)

I certify that the termination of electric service would be especially dangerous to health or safety of:

Patient name _____ *who is a permanent resident at*

Address _____ City _____ State _____ ZIP _____

and that the termination of service would aggravate an existing medical condition or create a medical emergency.

Life Support will not be valid unless signed by a Minnesota licensed Physician, Physician Assistant or Nurse Practitioner. Any medical professional signing this form must note their license number on this form in the section below.

4C. Add an email address to the form to allow qualified medical professionals to email a completed and scanned form to the Company's Personal Account Representative.

If you have questions regarding this certificate, please call the Personal Accounts Department of Xcel Energy at 866-975-7327.

Please mail completed form to:

Xcel Energy
Attention: Energy Assistance Program
3115 Centre Pointe Drive
Roseville, MN 55113

Form can be faxed or emailed to:

Fax: 612-564-7643
Email: PEAP.EAP@xcelenergy.com

4D. Provide 30 calendar Days for a customer to obtain written certification.

The Company has modified our processes to provide 30 calendar days for a new or a renewing customer to obtain written certification that failure to connect or continue service would impair or threaten the Health or safety of a resident of the customer's household.



4E. Meet with or present information about the medical registry to organizations identified by AARP, OAG, and Energy CENTS Coalition.

Xcel agrees to meet with and/or present information abouts its medical registry form and energy assistance programs to the following organizations:

1. Senior LinkAge Line – **Met with**
 2. Leading Age Minnesota
 3. Care Providers of Minnesota
 4. Minnesota Homecare Association
 5. SEIU Healthcare Minnesota & Iowa
 6. Alzheimer’s Association
 7. Visiting Nurses Association – **Declined**
 8. MN Department of Veterans Affairs
 9. Central MN Council on Aging - **Declined**
 10. MN Indian Area Agency on Aging
 11. Southeastern MN Area Agencies
 12. Metropolitan Area on Aging (Trellis)
 13. MN Association of Area Agencies on Aging
- MN Medical Association – **Met with, not on the agreed to list above.**
 - Sending invitations to the remaining to an information session to hear about our medical protections and Medical Affordability Program.

Order Point 4.F: Medical Registry Information

The Company currently provides medical registry information to all Minnesota customers annually to inform them of this protection opportunity. This information is contained in a billing onsert that is sent to customers in September of each year.



DO YOU HAVE MEDICAL EQUIPMENT INSIDE YOUR HOME?

At Xcel Energy, we take your safety seriously, so we offer medical protection plans to qualifying customers with medical equipment inside their homes! If you have medical equipment and want more information on the protection plans offered, please visit our website at [xcelenergy.com/EnergyAssistance](https://www.xcelenergy.com/EnergyAssistance) and click **Medical Affordability Program**.

In addition to account protections, Xcel Energy offers energy affordability programs to those with medical equipment who are income qualified! To learn more, visit our website [xcelenergy.com/EnergyAssistance](https://www.xcelenergy.com/EnergyAssistance) or call our Personal Accounts department at **866-975-7327**.

K. Detailed information on the number of customers opting out of AMI meter installation and demand-billed customers compared to customers with AMI meters installed.

- 2023 opt-out and AMI meter installations.
- Demand customers are billed from commercial meters only.

2023 AMI Statistics

Meter Type	Residential	Commercial	Industrial	Other	Total
AMI Opt Outs	1,158	N/A	N/A	N/A	1,158
AMI	657,459	9,038	47	0	666,544

L. A proposal for using the capacity of its advanced metering infrastructure to restore electric service to customers during periods of extreme heat

- Utilized the National Weather Service notifications for this proposal, consistent with Minnesota Statute §216B.0975, subpart b, regarding disconnections.
- **Excessive Heat Watch:** Heat watches are issued when conditions are favorable for an excessive heat event in the next 24 to 72 hours.
- **Heat Advisory:** A Heat Advisory is issued within 12 hours of the onset of extremely dangerous heat conditions. The general rule of thumb for this Advisory is when the maximum heat index temperature is expected to be 100° or higher for at least 2 days, and night time air temperatures will not drop below 75°.
- **Excessive Heat Warning:** An Excessive Heat Warning is issued within 12 hours of the onset of extremely dangerous heat conditions. The general rule of thumb for this Warning is when the maximum heat index temperature is expected to be 105° or higher for at least 2 days and night time air temperatures will not drop below 75°.

L. A proposal for using the capacity of its advanced metering infrastructure to restore electric service to customers during periods of extreme heat [CONT.]

- When a heat advisory or excessive heat warning is forecast by the National Weather Service in the next 24 hours, the Company can query all current AMI enabled, disconnected customers.
- We can reach out to AMI customers via their preferred channel, i.e. phone call, email, or MyAccount and advise that service will be temporarily restored for the anticipated duration of the heat advisory or excessive heat warning.
- The Company can track annually and by month, the number of days these conditions apply, the number of active Xcel Energy customer accounts disconnected during each of those periods, and number of Xcel Energy accounts reconnected.
- Service reconnection of an AMI meter may be impacted by a customer's working on site generator voiding the reconnection, meter tampering, or equipment failure.

Questions and Input?

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Wrap Up

- Slides and a meeting summary will be posted to:
Docket No. E002/M-24-27 Xcel Energy's Electric Service Quality, Service Reliability
- Follow up questions: Patricia.B.Leaf@XcelEnergy.com



THANKS FOR JOINING US!

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 NOS. E002/M-24-27
E002/M-22-233

Dated this 29th day of April 2024

/s/

Christine Schwartz
Regulatory Administrator

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