

NOTICE OF COMMENT PERIOD

Issued: April 20, 2020

In the Matter of Minnesota Power, Otter Tail Power, and Xcel Energy's Compliance with Annual Safety, Reliability, and Service Quality Metrics for 2019

PUC Docket Numbers: E017/M-20-401
E015/M-20-404
E002/M-20-406

Comment Period¹: Initial comment period closes August 12, 2020 at 4:30pm

Reply comment period closes August 26, 2020 at 4:30pm

Comments received after the close of the comment period may or may not be considered by the Commission.

Issue: Utilities' safety, reliability, and service quality reports for 2019.

Topics Open for Comment:

All Dockets

1. Should the Commission accept Minnesota Power's, Otter Tail Power's, and Xcel Energy's 2019 Safety, Reliability, and Service Quality Metrics reports?
2. Should the Commission approve Minnesota Power's, Otter Tail Power's, and Xcel Energy's proposed transition from a rolling five year average to set reliability standards to benchmarking to the IEEE Reliability Working Group? Please discuss:
 - a. Time lag of IEEE benchmarking data.
 - b. Xcel's proposal to use a 5 year average of IEEE 2nd quartile results vs Otter Tail Power and Minnesota Power's proposals to use the prior year's benchmarking results, and keeping standards consistent between utilities.
 - c. The move from reporting reliability results for each work center, to the state as a whole, and whether utilities need a variance to Minn. Rules 7826.0500 Subp 1 A-C, and Subp 2.
 - d. The choice of using the IEEE working group vs EIA data for benchmarking.
3. Feedback on utilities' proposed public facing summary of the annual reports. Please discuss:

¹ The comment period has been extended in this case to accommodate Department of Commerce and Commission's staff's workload.

- a. Whether the information is digestible for members of the general public
 - b. If there is any additional content utilities should include in the documents
 - c. Potential methods of distributing this information to customers
4. Should the Commission grant Xcel Energy's requested variance to Minn. Rules [7826.0500 Subpart 1.G](#)? Should the Commission vary this rule for all utilities?
 5. Are there other issues or concerns related to this matter?

Docket E002/M-20-406 (Xcel Energy) – Locational Reliability, Service Quality, and Equity Metrics

1. Please provide feedback on the staff proposal for locational reliability reporting (Attachment A). Please discuss:
 - a. Whether the listed reporting requirements will allow for the development of a locational reliability metric
 - b. Whether any additional information is needed
 - c. How the information can best be presented to stakeholders and the public
2. What are the appropriate pieces of data to collect to gauge locational customer service quality?
3. What are the appropriate pieces of information to overlay with reliability and customer service quality data to gauge equity? For example, the Minnesota Pollution Control Agency maintains a map showing areas of environmental concern that could be overlaid with data listed in Attachment A.
4. Are there other issues or concerns related to this matter?

Background Minnesota Power, Otter Tail Power, and Xcel Energy submit annual Safety, Reliability, and Service Quality (SQR) Reports. Standards and reporting requirements are set under Minn. Rules, Chapter 7826 and in Commission orders.

In its January 28, 2020 Order the Commission required utilities to discuss “transitioning from a five year rolling average method of proposing SAIDI, SAIFI, and CAIDI standards, to standards that are similar to the second quartile rank of similarly sized investor-owned utilities under either the IEEE benchmarking study or using United States Energy Information Administration (EIA) reliability data.” In their 2019 reliability reports, the utilities all suggested shifting to the IEEE benchmarking study, using the 2nd quartile results.

Also in its January 28, 2020 Order the Commission required utilities to file a 1-2 page summary for the general public of its reliability and service quality reports. The utilities filed this information in their reports:

Minnesota Power: Attachment D in Docket 19-404

Otter Tail Power: Attachment 2 (PDF page 29) in Docket 19-401

Xcel Energy: Attachment B (PDF page 96) in Docket 19-406

In Docket 17-401, Xcel Energy's performance metric docket, the Commission directed the development of the following metrics (among others):

1. Locational reliability
2. Equity – reliability by geography, income, or other relevant benchmarks
3. Equity metric – customer service quality by geography, income, or other relevant benchmarks

The first two metrics both relate to reliability looked at spatially, while the third is the same for customer service quality. Staff and the Commission referred development of future metrics relating to locational reliability and service quality to the present docket. The Commission’s September 18, 2019 Order Discussion of locational metrics includes looking at how equity is considered spatially. In Xcel’s 2018 Service Quality Report (Docket No. 19-261), the Commission approved staff soliciting comment on a reporting proposal to inform the development of a locational reliability metric.

Filing Requirements: Utilities, telecommunications carriers, official parties, and state agencies are **required** to file documents using the Commission’s electronic filing system (eFiling). All parties, participants and interested persons are encouraged to use eFiling: mn.gov/puc, select *eFiling*, and follow the prompts.

Submit Public Comments:

Online: Visit mn.gov/puc, select “[Submit Comments](#)” and follow the prompts

Email: consumer.puc@state.mn.us

U.S. Mail: Consumer Affairs Office
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul MN 55101

Full Case Record: See all documents filed in this docket via the Commission’s website at mn.gov/puc, select *Search eDockets*, enter the year (20) and the docket number (401 or 404 or 406), and select *Search*.

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Questions about this docket or Commission process and procedure? Contact Commission staff, Hanna Terwilliger, at hanna.terwilliger@state.mn.us or 651-201-2243.

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To request this document in another format such as large print or audio, call 651-296-0406 (voice). Consumers with a hearing or speech impairment may call using their preferred Telecommunications Relay Service or email consumer.puc@state.mn.us for assistance.

Attachment A: Locational/Equity Reliability Staff Proposal

Items in italics are new from previously reported data. Section 1 is based on Xcel's response to Commission IR 3 in Docket 17-776. Section 2 is based on Xcel's current "worst performing feeder" reporting in the present docket list.

1. Xcel shall provide, on an annual basis, a list of all sustained outages greater than 5 minutes in length with the following information:
 - a. Customers Out
 - b. Duration of outage, in actual minutes
 - c. Customer Minutes Out
 - d. Feeder ID
 - e. *Substation*
 - f. *City or area in which the feeder is primarily located*
 - g. Reliability reporting region
 - h. Outage Level
 - i. Primary Event Index
 - j. Whether or not the event was excluded as a major event day under the IEEE
 - k. The primary cause of the outage
 - l. The start day, month, *and year* of the outage
2. Xcel shall provide the following information, by feeder, for the calendar year:
 - a. Reliability reporting region where the feeder is located
 - b. The substation the feeder is on, with its full name
 - c. The city or area in which the feeder is primarily located
 - d. *The number of customers on the feeder, including the proportion of residential to commercial and industrial*
 - e. *Whether the feeder is overhead or underground*
 - f. SAIDI, SAIFI, and CAIDI, normalized (IEEE 1366 Standard) and with Major Event Days
 - g. Number of outages, total customer outages, and total customer-minutes-out for the following situations:
 - i. All levels, All Causes included
 - ii. Bulk Power supply - All causes, distribution, substation, transmission substation, and transmission line levels
 - iii. All levels, no "planned" cause, includes bulk power supply
 - iv. All levels, "planned" cause only, includes bulk power supply
3. A publically available online map showing reliability by feeder that allows interested individuals to zoom in to a neighborhood level, and if possible, the ability to have pop-ups that indicate reliability values, except to the extent that publicly disclosing this data would violate specific data privacy requirements or pose a significant security risk to Xcel's system or its customers. If Xcel withholds any information on this basis, Xcel shall provide the Commission with a full description and specific basis for withholding the information, including any Trade Secret claims.