

Staff Briefing Papers: Volume 2/2

Meeting Date	November 30, 2023	Agenda Item 5*
Company	Northern States Power Company d/b/a Xcel Energy; Minnesota Power; Otter Tail Power Company	
Docket No.	E-002/M-23-73 In the Matter of Xcel Energy’s 2022 Annual Safety, Reliability and Service Quality Report	
	E-015/M-23-75 In the Matter of Minnesota Power’s 2022 Annual Safety, Reliability and Service Quality Report	
	E-017/M-23-76 In the Matter of Otter Tail Power Company’s 2022 Annual Safety, Reliability and Service Quality Report	
Issues	<ol style="list-style-type: none">1. Should the Commission accept Minnesota Power’s, Otter Tail Power Company’s, and Xcel Energy’s 2022 Safety, Reliability, and Service Quality Metrics Reports?2. Are the utilities’ reports consistent with recent Orders¹ and Minn. Rules Ch. 7826 on Electric Utility Standards?3. At what level should the Commission set the utilities’ 2023 Reliability Standards?4. What additional solutions might utilities pursue to improve call center response time?5. Are there other issues or concerns related to this matter?	
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¹ See Orders associated with Docket Nos.: Xcel Energy (E002/M-21-237 and E002/M-20-406); Minnesota Power (E015/M-21- 230 and E015/M-20-404); Otter Tail Power (E017/M-21-225 and E017/M-20-401).

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The attached materials are work papers of the Commission Staff. They are intended for use by the Public Utilities Commission and are based upon information already in the record unless noted otherwise.

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651-201-2232

**Relevant Documents****Date****23-73 Xcel Energy**

Xcel Energy Annual Report Parts 1 & 2 and Attachments K & L	March 31, 2023
Xcel Energy Errata re: Corrected Call Center Response Time	June 5, 2023
Department of Commerce Comments re: Xcel	June 16, 2023
City of Minneapolis Comments re: Xcel	June 16, 2023
Xcel Energy Reply Comments	June 30, 2023
Department of Commerce Reply Comments re: Xcel	June 30, 2023
Xcel Energy Supplemental Comments re: IEEE	August 16, 2023
Department of Commerce Letter	September 25, 2023

23-75 Minnesota Power

Minnesota Power Annual Report and Appendices A-C	April 3, 2023
Department of Commerce Comments re: Minnesota Power	June 16, 2023
Minnesota Power Reply Comments and Attachment A	June 30, 2023
Minnesota Power Supplemental Comments and Attachment A	August 4, 2023
Minnesota Power Compliance Filing re: IEEE	August 24, 2023
Department of Commerce Letter	September 28, 2023
Ex Parte Communications	October 25, 2023

23-76 Otter Tail Power

Otter Tail Power Annual Report	April 3, 2023
Department of Commerce Comments re: Otter Tail Power	June 16, 2023
Otter Tail Power Reply Comments	June 30, 2023
Otter Tail Power Supplemental Comments re: IEEE	August 16, 2022
Department of Commerce Letter	September 28, 2023

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I. Statement of the Issues

1. Should the Commission accept Minnesota Power's, Otter Tail Power Company's, and Xcel Energy's 2021 Safety, Reliability, and Service Quality Metrics Reports?
2. Are the utilities' reports consistent with recent Orders² and Minn. Rules Ch. 7826 on Electric Utility Standards?
3. At what level should the Commission set the utilities' 2022 Reliability Standards?
4. What additional solutions might utilities pursue to improve call center response time?
5. Are there other issues or concerns related to this matter?

II. Introduction

Minnesota's Electric Investor-Owned Utilities (IOUs) – Minnesota Power (MP), Xcel Energy (Xcel), and Otter Tail Power Company (OTP) (jointly referred to as the Utilities) – submit Safety, Reliability, and Service Quality (SRSQ) reports annually.³ All three IOUs filed SRSQ reports by April 3, 2023.

Volume 1 of the briefing papers will address safety and reliability. This set of briefing papers, Volume 2, will address utility service quality. Both volumes end with an identical set of decision options.

Standards and reporting requirements are set under Minn. Rules Chapter 7826,⁴ and in Commission Orders.⁵

On March 25, 2020, the Commission and the Department of Commerce sent a joint letter to all utilities requesting a halt to all service disconnections as a response to the COVID-19 pandemic outbreak while the Governor Walz-issued peacetime Emergency Order 20-01 was in place.⁶ In its May 26, 2021 Order in Docket No. 20-375, the Commission allowed a resumption of disconnections on August 2, 2021.⁷ As a result, for 17 months, utilities were under a disconnection moratorium.

Thus, data from 2022 show the first full year without a disconnection moratorium. Therefore, note that disconnection numbers will be inflated compared to recent years as disconnections

² See Orders associated with Docket Nos.: Xcel Energy (E-002/M-21-237 and E-002/M-20-406); Minnesota Power (E-015/M-21-230 and E-015/M-20-404); Otter Tail Power (E-017/M-21-225 and E-017/M-20-401).

³ In Docket No. 22-74, Dakota Electric Association filed a SRSQ report as an informational courtesy. The Commission is not required to make a decision upon its report. The docket has been administratively closed.

⁴ Minn Rules 7826 Electric Utility Standards. (<https://www.revisor.mn.gov/rules/7826/>) The requirements are listed in Table 1.

⁵ Relevant Orders are listed in Table 1 of the briefing papers.

⁶ 20-375 Commission and Department joint letter Re: Responsive Measures to the Outbreak of COVID-19, March 25, 2020.

⁷ 20-375 Order, May 26, 2021.

have returned to pre-pandemic levels. However, customers may still be impacted by accumulated debts.

Beyond the service quality reporting outlined in MN Rules 7826.1400 – 7826.2000, Table 1 includes all additional information ordered in safety, reliability, and service quality dockets, following utilities' data from 2019 (Order issued December 18, 2020), 2020 (Order issued December 2, 2021), and 2021 (Order issued November 9, 2022), as well as in one pilot. Orders are grouped by issue and then by date.

Table 1: Service Quality Reporting Additional Requirements⁸

Reporting Standard	Order Issue Year	Details
7826.1700 & 7826.2000	2020	Utilities must provide baseline data information on electronic utility-customer interaction: yearly total number of website visits; logins via electronic customer communication platforms; emails or other customer service electronic communications received; and categorization of emails and electronic customer service communications by subject.
	2021	Utilities must continue to provide information on electronic utility-customer interaction.
	2022	Utilities must provide, in 2023, percentage uptime and error rate percentage information in their annual reports for the next three reporting cycles, to build baselines for web-based service metrics.
7826.1700	2020	Xcel must clarify call center data.
	2021	Xcel Energy must provide additional information in its 2022 filing on progress made hiring new call center representatives in 2021 and the effects of those employees on its agent only metrics.
	2022	Minnesota Power must report efforts to hire in its call center if 2022 data do not meet service standards in MN Rule.
7826.2000	2020	Utilities must file revised complaint reporting categories.
	2021	Xcel Energy must add a "DER Complaint" reporting subcategory, with input from the Complaint working group.
	2022	Xcel must provide length of time to respond to all DER communications.
	2023	Utilities must include customer complaint data from Minnesota Rules 7820.0500 ⁹ in their Annual Service Quality reports.
Other	2020	Utilities must file, and Executive Secretary can approve Public Facing Summaries.
	2021	Utilities must file public facing summaries and publish summaries in locations visible to consumers.
	2022	Utilities must place public facing summaries one click from Home Page.
7826.1800	2020	Utilities must explain their Medical Status engagement plans.

⁸ Docket Nos. E-002/M-20-406, E-017/M-20-401, E-015/M-20-404 (2020); E-002/ M-21-237, E-017/ M-21-225, E-015/ M-21-230 (2021); E-015/M-22-163, E-017/M-22-159, E-002/M-22-162 (2022).

⁹ Minn. Rule 7820.0500 Reporting Requirement. (<https://www.revisor.mn.gov/rules/7820.0500/>)

Other	2020	Minnesota Power will provide data on Remote Reconnect Pilot in SRSQ filings. ¹⁰
Other	2020	Xcel must work with stakeholders on its interactive map.
7826.1400	2022	Xcel must provide data on discreet, unread meters.

III. Reporting Standards

In the below section, Staff lays out service quality reporting standards as such:

- Minn. Rules dictating service quality and their specific reporting standards;
- A checklist that shows whether the utilities completed each reporting requirement; and¹¹
- Relevant highlights regarding each utilities' service quality.

A. 7826.1400 Meter Reading Performance

Utilities must report on how many meters were read and provide an explanation as to why meters were not read.¹² In addition to the below reporting requirements, utilities must, between April – November, read at least 90% of customer meters; between December – March, at least 80% of meters must be read.¹³

Table 2: Meter Reading Performance

Utility	Meters read by Utility (#/%)	Meters self-read (#/%) ¹⁴	Meters not read for 6-12 and 12+ months	Explanation for meters not read	Meter reading staffing levels
Xcel	✓	✓	✓	✓	✓
MP	✓	✓	✓	✓	✓
OTP	✓	✓	✓	✓	✓

The Department acknowledged Xcel, MP, and OTP's fulfillment of the requirements of Minnesota Rules regarding meter reading.¹⁵

Xcel

In 2022, some customers had been updated to an Advanced Meter Infrastructure (AMI) meter, but most customers were still read using Cellnet Automated Meter Reading (AMR) service.

¹⁰ Docket No. 19-766 Order Approving Pilot Program, December 9, 2020, p. 4.

¹¹ A check mark (✓) indicates that the required data was included in the utilities' 2022 annual reports.

¹² Minn. Rule 7826.1400 Meter Reading Performance. (<https://www.revisor.mn.gov/rules/7826.1400/>)

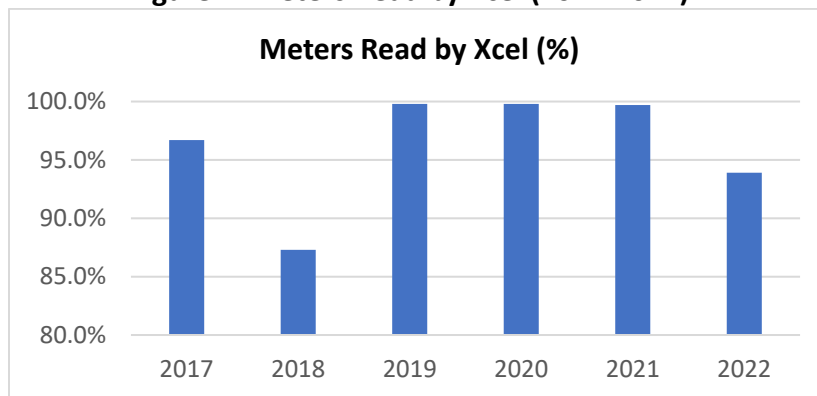
¹³ Minn. Rule 7826.0900 Meter Reading Frequency; Customer Accommodation, Subpart 1. (<https://www.revisor.mn.gov/rules/7826.0900/#rule.7826.0900.1>)

¹⁴ Utilities report unique meters unread, rather than repeated attempts at reading the same meters.

¹⁵ 23-73 (Xcel) Department comments, June 16, 2023, p. 10; 23-75 (MP) Department comments, June 16, 2023, p. 22; 23-76 (OTP) Department comments, June 16, 2023, p. 17.

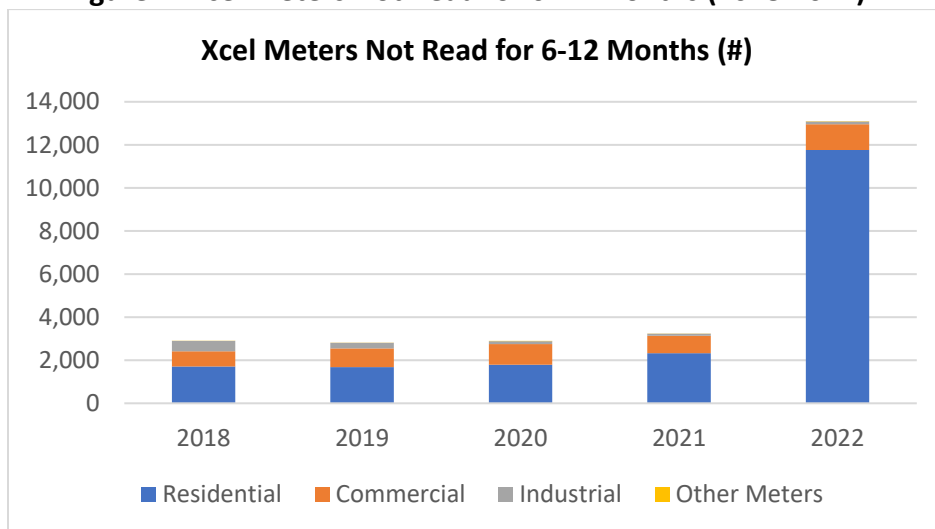
Xcel had a meter reading staff level of 12.5 employees by the end of 2022 in Minnesota.¹⁶ Xcel personnel read an average of 93.9% in 2022.¹⁷ Meters read by Xcel customers resumed to pre-2020 numbers.

Figure 1: Meters Read by Xcel (2017-2022)¹⁸



The number of meters not read for 6-12 months in 2022 has more than tripled compared to previous years. In 2022, 13,097 meters went unread for 6-12 months. The previous 4-year average (2018-2021) was only 2,960 meters unread for 6-12 months.

Figure 2: Xcel Meters Not Read for 6-12 Months (2018-2022)¹⁹



There was a 342% variance over previous years across customer classes for meters gone unread for 6-12 months. The largest variance was in the residential class, while the industrial class saw a decrease.

¹⁶ 23-73 (Xcel) report, Section I, March 31, 2023, p. 6.

¹⁷ 23-73 (Xcel) Department comments, June 16, 2023, p. 7.

¹⁸ 23-73 (Xcel) Department comments, June 16, 2023, Table 2, p. 8.

¹⁹ 23-73 (Xcel) Department comments, June 16, 2023, Table 3, p. 9.

Table 3: Meters not Read for 6-12 Months with Variances²⁰

Year	Residential	Commercial	Industrial	Other	Total
2018-2021 Average	1,877	835	245	9	2,960
2022	11,765	1,196	125	11	13,097
Variance (%)	527%	43%	-49%	29%	342%

The number of meters not read for 12+ months in 2022 have increased as compared to previous years.²¹

The most common reason for not reading meters across customer classes was “No Reading Returned.” These are situations where Xcel is not able to manually read a meter that is not transmitting usage data, Xcel contacts the customer asking them to contact the company, and the customer does not respond.²²

The Department attributes Xcel’s decline in meter reading on its replacement of its existing metering system to the Advanced Metering Infrastructure (AMI) due to supply chain issues.²³ Xcel anticipates a better “meter network under AMI to allow more system readings of the smart meters, decreasing our need to estimate bills or send field personnel to our customers’ homes.”²⁴

Staff notes that, per Xcel’s Time of Use (TOU) rate design pilot, complete AMI rollout is anticipated in 2025.²⁵

Staff concurs with the Department’s analysis but acknowledges that the average level of 93.9% of meters read by utility personnel in 2022 fulfills MN Rules 7826.0900.

The Department asked Xcel to explain the drivers behind:

- 1) The 29% increase in the number of meters not read for 6-12 months; and
- 2) The 35% increase in the number of “Other” meters not read for 12+ months.

Xcel responded that its staff read a larger number of meters included in the ‘not read for 12+ months’ category but were not able to keep up with the ‘meters not read for 6-12 months’ category in 2022. The Department says that “the Company would want to focus its efforts on the ‘meters not read for more than twelve months’ category as it is likely the amount of unrecovered revenue associated with each of those customers would be larger than for the ‘meters not read for six to twelve months’ category on a per customer basis.”²⁶

²⁰ 23-73 (Xcel) Department comments, June 16, 2023, Table 3, p. 9.

²¹ 23-73 (Xcel) Department comments, June 16, 2023, pp. 8-9.

²² 23-73 (Xcel) report, Section I, March 31, 2023, p. 4.

²³ 23-73 (Xcel) Department comments, June 16, 2023, p. 8.

²⁴ 23-73 (Xcel) report, Section I, March 31, 2023, p. 5.

²⁵ 23-467 Xcel Transmission Cost Recovery (TCR) Rider petition, November 1, 2023, Attachment 2, p. 3 of 3.

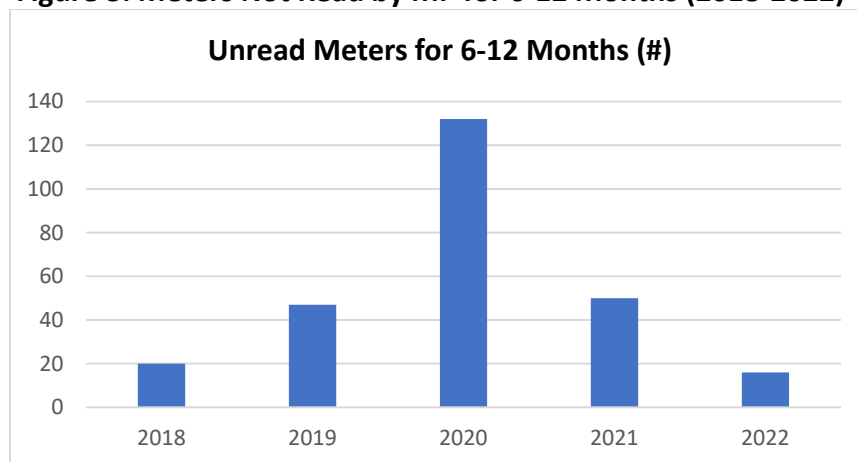
²⁶ 23-73 (Xcel) Department letter, September 25, 2023, p. 2.

MP

In 2022, MP employed approximately 5.6 meter reading staff. MP personnel read an average 99.88% of meters in 2022.²⁷

MP did not read 16 meters within 6-12 months. This returns MP to pre-pandemic levels, dropping to the lowest number of unread meters within 6-12 months within the last five years. When a meter goes unread for more than six months, MP will contact the customer by in-person notices, reminder letters, or phone calls. MP did not have any meters that went unread for more than 12 months.

Figure 3: Meters Not Read by MP for 6-12 Months (2018-2022)²⁸



Meters that went unread was “due to no access to the meter location and/or the meter is of the automated meter reading (AMR) type.”²⁹

OTP

OTP reported 52 meter reading staff in 2022. OTP expanded the number of towns served by third-party meter readers.³⁰ OTP read an average of 96.5% meters system-wide each month in 2022.³¹ The Department writes that meter-reading performance has remained consistent over previous years.³²

10 meters were not read for 6-12 months in 2022. This number declined from 23 meters in 2021 and 52 meters in 2020. Now OTP is closer to pre-pandemic levels. Staff acknowledges this improvement.

²⁷ 23-75 (MP) report, April 3, 2022, p. 62.

²⁸ 23-75 (MP) Department comments, June 16, 2023, Table 11, p. 21.

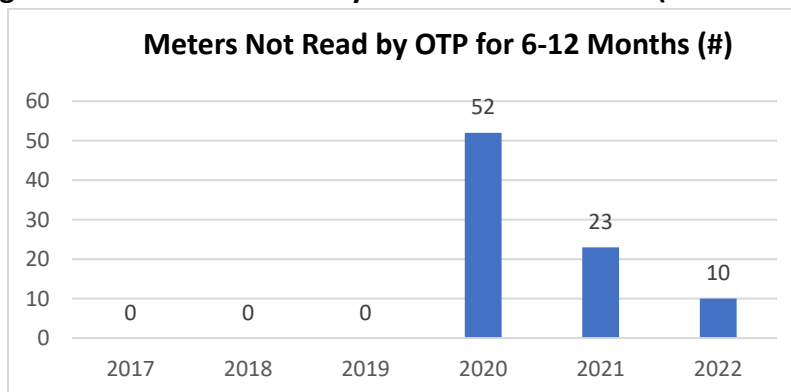
²⁹ 23-75 (MP) Department comments, June 16, 2023, p. 22.

³⁰ 23-76 (OTP) report, April 3, 2023, p. 48.

³¹ 23-76 (OTP) report, April 3, 2023, Table 19, p. 45.

³² 23-76 (OTP) Department of Commerce comments, June 16, 2023, p. 17.

Figure 4: Meters Not Read by OTP for 6-12 Months (2017-2022)³³



Two obstructed meters were not read for 12+ months in 2022, and the Company worked with customers to obtain access. For several years, OTP did not have any meters that had not been read for 12+ months.³⁴

On August 4, 2022, the Commission approved OTP's AMI project for tracker recovery and approved a soft cap on the project of \$55.9 million, less certain costs. Updates will be received in OTP's next Electric Utility Investment Cost (EUIC) rider petition, in which OTP must propose and establish performance metrics to track the AMI Project.³⁵ The Company expected install to begin in 2023 with estimated completion in 2025/26.

Xcel Energy was required to perform a parallel effort in Docket No. 21-814, proposing performance metrics and evaluations for its Transmission Cost Recovery (TCR) Rider.³⁶ The performance metric recommendations were included in Xcel's 2023 TCR Rider filing.³⁷ Xcel and OTP may be able to share effective practices for measuring AMI.

B. 7826.1500 Involuntary Disconnections

Minn. Rule 7826.1500 requires reporting on involuntary disconnections, including Cold Weather Rule (CWR) protections.³⁸ Minn. Stat. § 216B.096 requires utilities to provide additional protections to low-income residential customers between October 1 and April 30.³⁹

³³ 23-76 (OTP) report, April 3, 2023, p. 45.

³⁴ 23-76 (OTP) Department comments, June 16, 2023, p. 17.

³⁵ 21-382 Order, August 4, 2022.

³⁶ 21-814 Order, June 28, 2023.

³⁷ 23-467 Xcel TCR Rider filing, November 1, 2023.

³⁸ Minn. Rule 7826.1500 Reporting Involuntary Disconnections. (<https://www.revisor.mn.gov/rules/7826.1500/>)

³⁹ Minn. Stat. § 216B.096 Cold Weather Rule; Public Utility. (<https://www.revisor.mn.gov/statutes/cite/216B.096>)

Table 4: Reporting Required by MN Rule 7826.1500

Utility	Customers receiving disconnect notices	Customers seeking and granted CWR protection	Involuntary disconnects AND Restorations within 24 hours	Involuntary disconnects restored with a payment plan
Xcel	✓	✓	✓	✓
MP	✓	✓	✓	✓
OTP	✓	✓	✓	✓

The Department acknowledges OTP, MP, and Xcel's fulfillment of the requirements of Minnesota Rules, part 7826.1500.⁴⁰

In 2021, the Utilities were required to create new or discuss existing arrearage forgiveness programs within their Commission-ordered Transition Plans that discussed return to normal operations.⁴¹ The outcome of each Transition Plan is listed below:

- 1) Xcel's repayment program, the Payment Plan Credit Program, which provided between \$1,000 and \$4,000 to customers with past due balances, is discussed in more detail on p. 11 of the briefing papers.
- 2) MP offers a 100% match for arrearage repayments made by customers in its CARE program; during the pandemic, program funding and flat discounts increased.⁴² In September 2023, MP reported that the average monthly amount due for CARE customers is \$102.⁴³ The CARE program is discussed on pp. 16-17 of the briefing papers.
- 3) OTP's Transition Plan anticipated an affordability program filed in April 2021.⁴⁴ On March 18, 2022, OTP filed a petition for approval of its Uplift program.⁴⁵ The Commission approved the program petition on July 21, 2022.⁴⁶ OTP's Uplift Program is discussed on p. 18 of the briefing papers.

Next, Staff discusses each utilities' performance, followed by Staff analysis of all utilities' involuntary disconnection performance together.

Xcel

In 2022, a total of 668,855 Xcel residential customers received disconnection notices; 57,135 commercial customers received disconnection notices.⁴⁷ Customers receiving disconnection notices in 2022 increased by 87% as compared to 2019-2021 as shown in the figure below. This

⁴⁰ 23-73 (Xcel) Department comments, June 16, 2023, p. 13; 23-75 (MP) Department comments, June 16, 2023, p. 23; 23-76 Department comments, June 16, 2023, p. 19.

⁴¹ 20-375 Order, March 8, 2021, and Order, May 26, 2021.

⁴² 20-375 MP transition plan, April 1, 2021, p. 9.

⁴³ 23-02 MP September 2023 residential customer status report, October 20, 2023.

⁴⁴ OTP amended transition plan filed April 29, 2021 in Docket No. E,G999/CI-20-375 at 4.

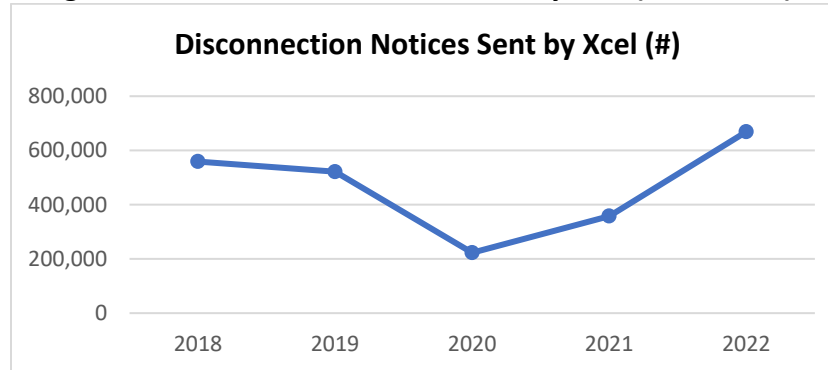
⁴⁵ 22-133 OTP petition for Uplift program, March 18, 2022.

⁴⁶ 22-133 OTP Order, August 8, 2022.

⁴⁷ Docket No. E-002/M-23-73 (Xcel) report, March 31, 2023, Attachment E.

is a dramatic increase; Staff will be monitoring it as to whether this is simply due to the end of the disconnection moratorium or if disconnection notices sent will continue to increase.

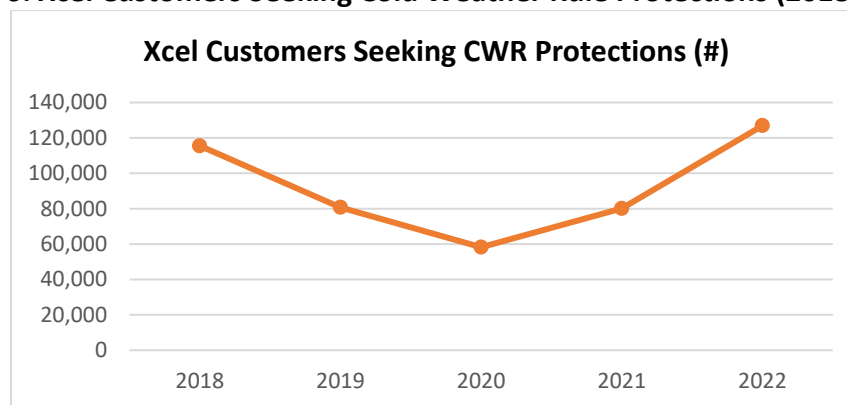
Figure 5: Disconnection Notices Sent by Xcel (2018-2022)⁴⁸



The Department writes that Xcel “appears to be working through customer arrearages resulting from the suspension of disconnections during the pandemic.”⁴⁹

In 2022, 126,910 customers sought and were granted CWR protection. The number of people seeking CWR protection increased and has returned to pre-pandemic levels.

Figure 6: Xcel Customers Seeking Cold Weather Rule Protections (2018-2022)⁵⁰



8,538 customers were involuntarily disconnected in 2022. Of that total, 3,197 of those customers had their service restored within 24 hours, and 5,533 customers had their service restored by entering into payment arrangement⁵¹.

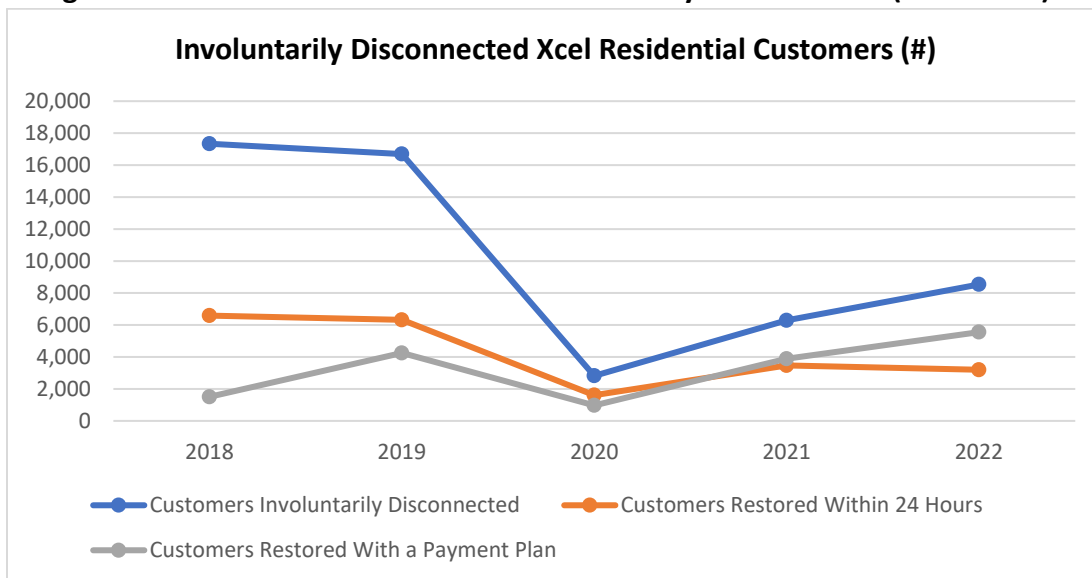
⁴⁸ Docket No. E-002/M-23-73 (Xcel) Department comments, June 16, 2023, Table 5, p. 12.

⁴⁹ Docket No. E-002/M-23-73 (Xcel) Department comments, June 16, 2023, p. 12.

⁵⁰ Docket No. E-002/M-23-73 (Xcel) Department comments, June 16, 2023, Table 5, p. 12.

⁵¹ Note that the number of Xcel customers that had their service restored within 24 hours and the number of customers that had their service restored by entering into a payment arrangement are not mutually exclusive. Customers may have entered into a payment arrangement and then had their service restored within 24 hours.

Figure 7: Xcel Residential Customers Involuntarily Disconnected (2018-2022)⁵²



Xcel's Payment Plan Credit Program

On April 7, 2021, the Commission approved Xcel's \$17.5 million Payment Plan Credit Program (PPCP), in response to the COVID-19 pandemic. Under the program, residential electric customers with past-due balances between \$1,000 and \$4,000 were eligible to receive 75% of their balance in bill credits over a term of up to 11 months if they entered a payment plan and continue to make monthly payments as arranged.⁵³

In Xcel's 26-month Status Report, Xcel had a remaining balance of \$855,405 as of July 14, 2023. 3,788 customers have completed their payment arrangement and received the full benefit. Both the Department and the Citizens Utility Board (CUB) support Xcel closing the program. The Department supported distributing the remaining funds to current PPCP participants, and CUB supported remanding the remaining funds to PowerOn.⁵⁴

On October 26, 2023, the Commission voted to close the program and distribute the remaining PPCP funds to the PowerOn program fund. Xcel must file a final report 30 days after the Order is filed, which as of November 21, 2023 is still forthcoming.

Xcel's PowerOn Program

Under Minn. Stat. § 216B.16, every Minnesota IOU is required to offer a low-income, affordability program. The programs are available to customers that receive energy assistance from the Low-Income Home Energy Assistance Program (LIHEAP). The affordability programs must:

⁵² 23-73 (Xcel) Department comments, June 16, 2023, Table 5, p. 12.

⁵³ 20-760 Order, April 17, 2021.

⁵⁴ 20-760 CUB comments, August 18, 2023, p. 5.

- 1) Lower the percentage of income that participating low-income households devote to energy bills;
- 2) Increase participating customer payments over time by increasing the frequency of payments;
- 3) Decrease or eliminate participating customer arrears;
- 4) Lower the utility costs associated with customer account collection activities; and
- 5) Coordinate the program with other available low-income bill payment assistance and conservation resources.⁵⁵

Practically, each program offers to households two components:

- 1) Affordable monthly payments as a percentage of its household income; and
- 2) Past-due bill forgiveness.

Xcel offers its PowerOn program, which is administrated by the Energy CENTS Coalition (ECC). Xcel's 2022 annual report offered the following stats about the program:⁵⁶

- PowerOn participation has remained steady since 2019 with 19,600 participants.
- The average program participant had a \$14,943 annual income, and 41.3% of participants were in the 0-75% of the Federal Poverty Level.
- More than \$8 million was distributed to participants.
- The average annual household bill amount was \$1,288, and the average annual program credit was \$488, or approximately 38% of the annual bill.
- Program participants had an average monthly kWh usage of 758 as compared to non-LIHEAP recipients' average usage of 715 kWh usage.

In Xcel's 2022 Gas Affordability Program (GAP)⁵⁷ proceeding, the Commission ordered Xcel to automatically enroll LIHEAP recipients in GAP.⁵⁸ Xcel has chosen to automatically enroll LIHEAP electric customers in PowerOn that also receive natural gas service. Automatic enrollment began in summer 2023. Staff expects participation in 2023 to rise and will monitor PowerOn enrollment in 2023 as related to automatic enrollment in GAP.

Xcel's Low Income, Low Usage Program

Energy CENTS Coalition (ECC) proposed a discount program for low-income residential customers with low energy usage in Docket No. E002/GR-21-630 (Xcel 2021 Rate Case). Xcel worked with ECC on formulating a program outline. In Order Point 63 of the Commission's July 17, 2023 Order in the Xcel 2021 Rate Case, the Commission ordered Xcel to implement the Low

⁵⁵ Minn. Stat. § 216B.16, Subd. 15. Low-income affordability programs. (<https://www.revisor.mn.gov/statutes/cite/216B.16#stat.216B.16.15>)

⁵⁶ 04-1956 and 10-854 2022 annual report, December 1, 2022.

⁵⁷ GAP is the natural gas equivalent of the electric low-income affordability programs.

⁵⁸ 22-257 Order, January 18, 2023, Order Points 13-15, p. 3.

Income Low Usage (LILU) program. Order Point 64 required Xcel to make the program available on October 1, 2023 and report on it on December 1, 2023 and annually thereafter.⁵⁹

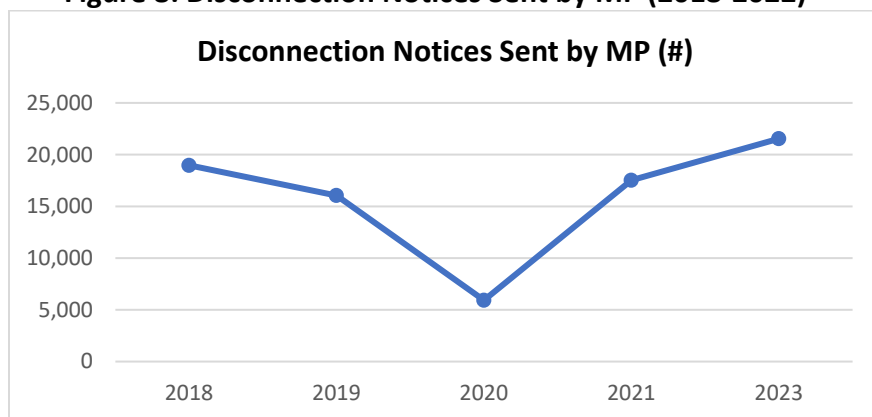
The LILU is a program for residential customers at or below 50% of the state median income guideline with an annual average monthly usage of 300 kWh or less. The Program provides a 35% discount per kWh paid on the following month's bill. Customers with the required income level and usage history will be automatically enrolled in the LILU. Xcel estimates that 87,000 customers will be able to enroll in the Program, and recovery will be done through Xcel's Low-Income Energy Discount Rider.⁶⁰

Staff has released a Notice of Comment Period, but this docket is not yet scheduled for the Commission's agenda meeting.⁶¹

MP

22,688 disconnection notices were sent to all customers; 21,583 of those notices were sent to residential customers (95% of all disconnection notices).

Figure 8: Disconnection Notices Sent by MP (2018-2022)⁶²



MP writes that the number of disconnection notices is higher than pre-COVID years; however, the number of actual service disconnections is consistent with that time period.⁶³ Staff notes that there was a spike in disconnection notices in May 2022, which matches the end of the CWR season.

Involuntary disconnections where residential customers were restored within 24 hours were much more common during CWR season (394 customers total) versus outside of CWR season (901 customers total). Restorations within 24 hours were more sporadic throughout the year for commercial customers; this tracks with the fact that commercial customers cannot take advantage of CWR protections.

⁵⁹ 21-630 Order, July 17, 2023, Order Point 63, p. 160.

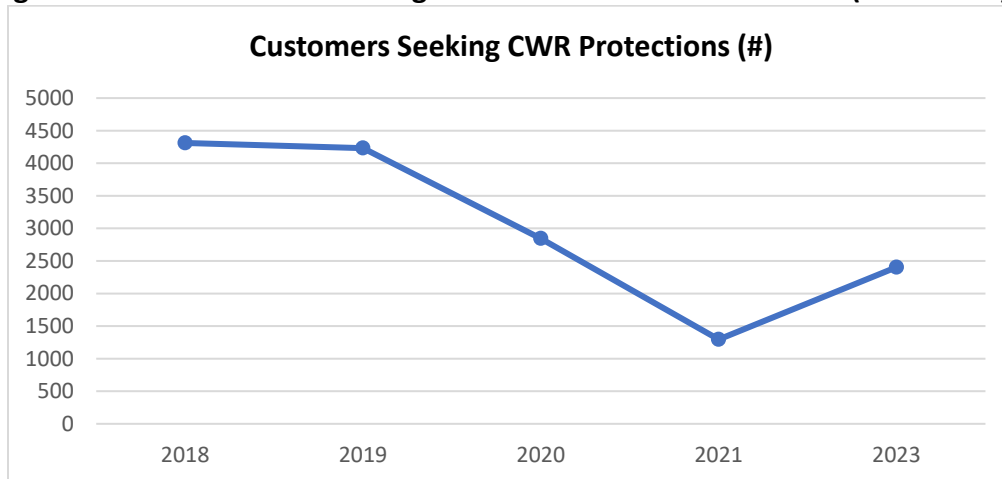
⁶⁰ 23-476 Xcel compliance filing, October 17, 2023.

⁶¹ 23-476 Notice of Comment Period, November 9, 2023.

⁶² 23-75 (MP) Department comments, June 16, 2023, Table 12, p. 22.

⁶³ 23-75 (MP) report, April 3, 2023, p. 76.

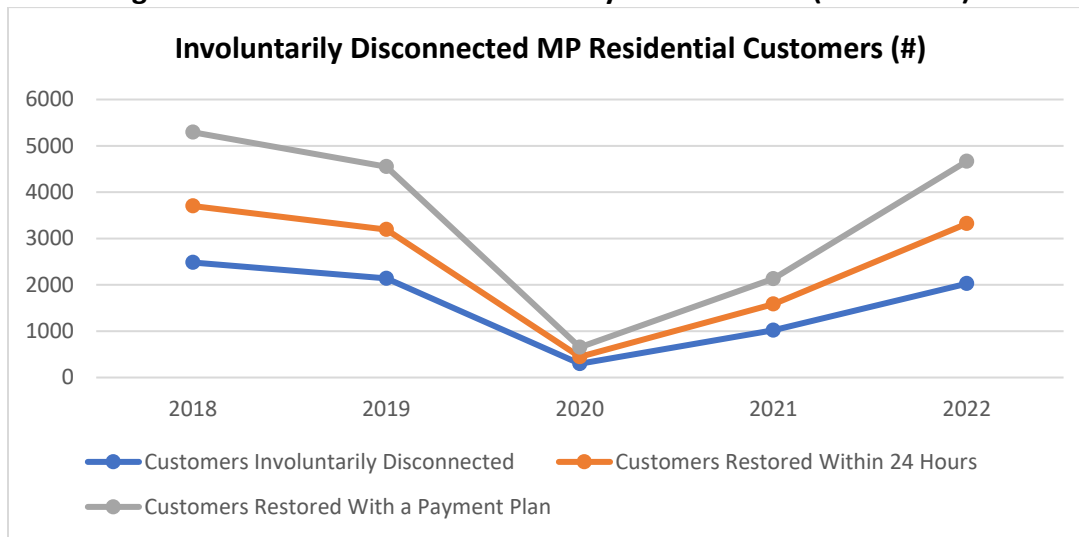
Figure 9: Xcel Customers Seeking Cold Weather Rule Protections (2018-2022)⁶⁴



MP granted CWR protection for every residential customer that requested it, which was 2,404 households. MP writes that CWR protection requests are down compared to pre-COVID years, which it explains as related to expanded protections elsewhere and extended payment plans.⁶⁵

The Department finds the number of customers seeking CWR protections and receiving disconnection notices concerning, but that the annual number of customers seeking these protections over the last 10 years has been trending downwards.⁶⁶

Figure 10: MP Customers Involuntarily Disconnected (2018-2022)⁶⁷



⁶⁴ 23-75 (MP) Department comments, June 16, 2023, Table 12, p. 22.

⁶⁵ 23-75 (MP) report, April 3, 2023, p. 77.

⁶⁶ 23-75 (MP) Department comments, June 16, 2023, p. 23.

⁶⁷ 23-75 (MP) Department comments, June 16, 2023, Table 12, p. 22.

Remote Reconnect Pilot Program

In Docket No. E-015/M-19-766, the Commission approved MP's three-year Remote Reconnect Pilot Program on December 9, 2020.⁶⁸ The Commission also required additional reporting in its annual SRSQ report. Note that MP halted disconnections in March 2020, and therefore the pilot, and then resumed the pilot program in August 2021.

In 2022, MP reported the following metrics regarding its Remote Reconnect pilot participants as part of the Order approving the Remote Reconnect Pilot Program.

Table 5: Remote Reconnect Pilot Reporting (2022)⁶⁹

Reporting Metric	Number
Pilot participants	4,437 customers
Total customers participating in LIHEAP	Approximately 8,875 customers per month
Remotely connected participants without LIHEAP	823 customers
Customers that have opted out of the Pilot	24 customers
Estimated annual cost savings from the Pilot⁷⁰	-\$48,000
Standard reconnection timeline	10 days
Pilot reconnection timeline	9 days
Percentage difference between standard and Pilot timelines	-10%

MP says that customer action greatly influences disconnection duration:

Minnesota Power recalculated these averages for customers who had a disconnection duration of ten days or less to remove large anomalies. Under this revised calculation, the average number of days under the Pilot was 0.81, as compared to the average number of days through the standard collection process of 0.89 days. For disconnection duration of 30 days or less, the average duration for the Pilot was 1.81 and standard collection process was 1.77 days. This indicates that, as the duration of disconnection grows, the impact of the Pilot and related technology on duration is lessened, further underscoring that customer action is an important impact consideration.⁷¹

Staff agrees that customer action must precipitate disconnection duration. A customer will not be reconnected without paying the entire amount or agreeing to a payment arrangement and paying a partial amount. However, according to these metrics, a reduction in disconnection duration from 10 days to 9 days is negligible for Pilot and non-Pilot customers. Customers that are on the Pilot cannot be isolated, in other words Pilot customers are not slower to pay their

⁶⁸ 19-766 December 9, 2020 Order Approving Pilot Program.

(<https://efiling.web.commerce.state.mn.us/edockets/searchDocuments.do?method=showPoup&documentId={B0544876-0000-CD14-AB56-DAF89733679D}&documentTitle=202012-168890-01>)

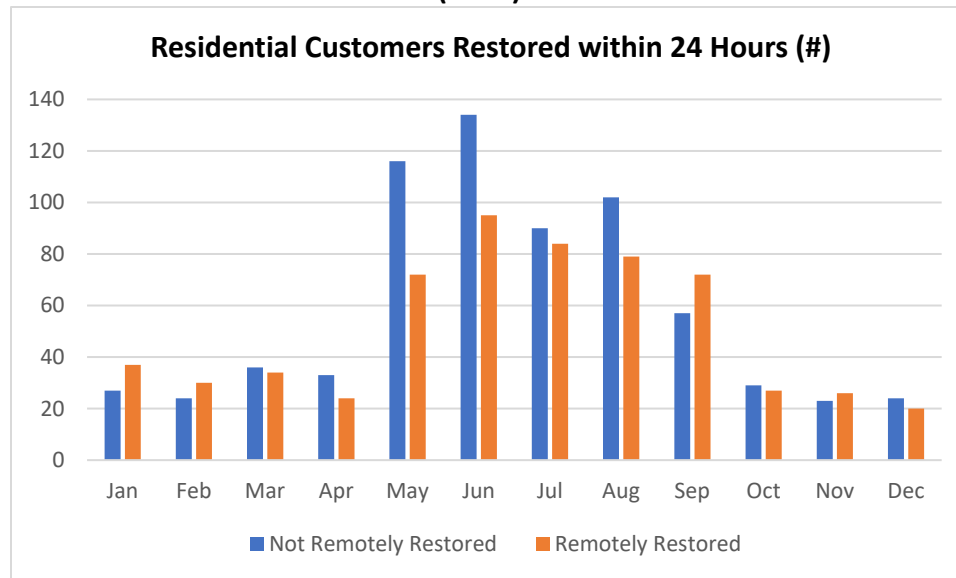
⁶⁹ 23-75 (MP) report, April 3, 2023, pp. 81-83.

⁷⁰ MP measures the estimated annual cost savings from the Pilot as an expenditure increase based on the incremental installed cost of the remote-capable meters.

⁷¹ 23-75 (MP) report, April 3, 2023, p. 82.

bill as compared to non-Pilot customers. The intention of the Pilot is to make up that timing difference. After payment, the Pilot customers should be reconnected sooner than the non-Pilot customers. Based on the results presented, Staff finds that there is no clear benefit for disconnection duration for Pilot participants as compared to standard customers.

Figure 11: Residential Customers Remotely and Non-Remotely Restored within 24 Hours (2022)⁷²



The Department says that the “Company represented this Pilot as essentially an efficiency gain” and goes on to say that the new technology installed “has not had time without the influences of COVID-19-related protections and Commission-approved Transition Plan to realize the benefits associated with the investments in the new meters.”⁷³ Staff anticipates a greater gain in the following years and will monitor whether this is the case.

MP’s CARE Program

MP’s CARE program follows Minn. Stat. § 216B.16, Subd. 15. Below are some facts about CARE in 2022:⁷⁴

- CARE had 6,092 active participants at year end 2022.
- The disconnection rate for CARE participants was 1.92%, which rose from 0.07% in 2021.
- The average annual billed amount in 2022 was \$736, which is higher than 2021 at \$631 annually.
- The average annual bill credit was \$381, or 52% of the average participant’s bill.

⁷² 23-75 (MP) report, April 3, 2023, Figure 21, p. 83.

⁷³ 23-75 (MP) Department comments, June 16, 2023, p. 34.

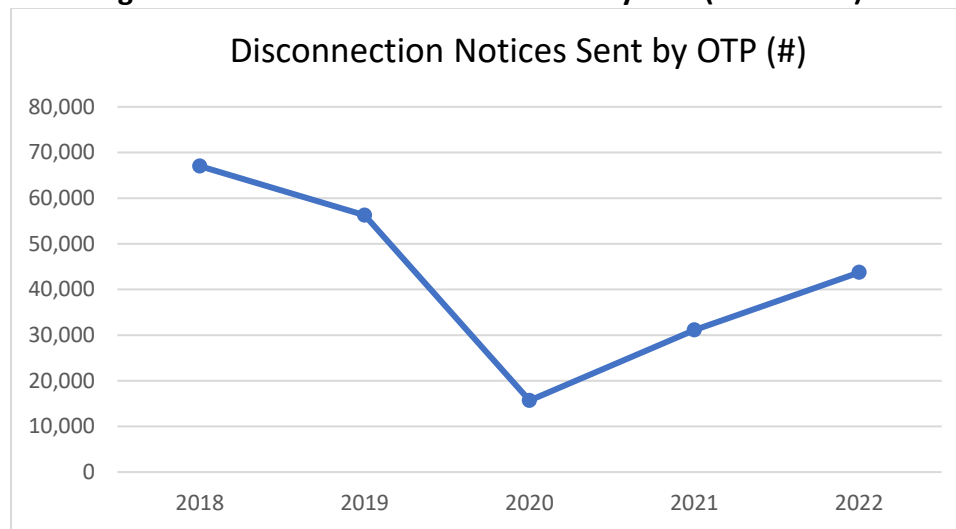
⁷⁴ 11-409 MP 2022 CARE Annual Report, March 1, 2023.

- The average CARE participant’s usage was 768 kWh per month in 2021, which rose from 709 kWh in 2021.

OTP

In 2022, OTP sent 47,590 customers disconnection notices. Staff finds that while the number of disconnection notices sent in 2022 was higher than 2021 and 2020, 2022 is still below the number of notices sent pre-pandemic.

Figure 12: Disconnection Notices Sent by OTP (2018-2019)⁷⁵



OTP granted 379 customers CWR protection, while 444 customers sought that protection. OTP said that “customers were not denied CWP [Cold Weather Protection] but rather the customer chose an alternative payment option.”⁷⁶ Staff questions whether OTP offers set payment arrangement options, one of which being a CWR payment plan, and will ask about the various options in OTP’s 2023 SRSQ report.

The Department noted that disconnection notices and customers seeking CWR protections have increased in 2022 as compared to 2021, but overall, both metrics have been trending downwards.⁷⁷

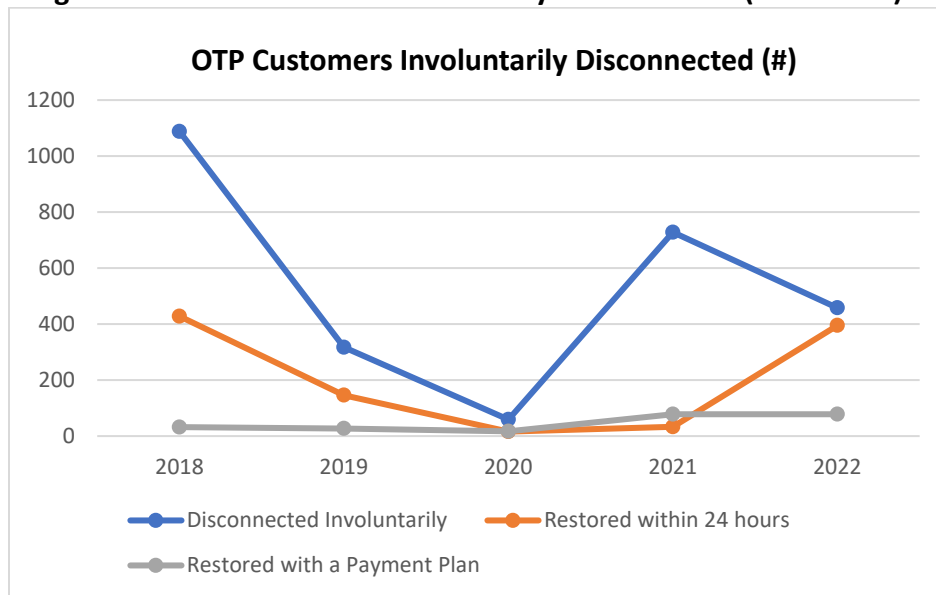
78 residential customers and 3 small commercial customers were restored to service by entering into a payment plan.

⁷⁵ 23-76 (OTP) Department comments, June 16, 2023, Table 10, p. 18.

⁷⁶ Docket No. E-017/M-23-76 (OTP) report, April 3, 2023, p. 50.

⁷⁷ Docket No. E-017/M-23-76 (OTP) Department comments, June 16, 2023, p. 18.

Figure 13: OTP Customers Involuntarily Disconnected (2018-2022)⁷⁸



OTP's Uplift Program

On March 18, 2022, OTP filed a petition with the Commission proposing a low-income affordability program. In the Commission's August 8, 2022 Order, OTP's Uplift Program was approved.

OTP's Uplift Program is also mandated by Minn. Stat. § 216B.16, Subd. 15. Customers that have been approved for the Uplift Program receive credit based on their kWh usage at their service location for the 12 months prior to application approval.

Table 6: OTP's Uplift Program Monthly Bill Credits Based on Annual Usage⁷⁹

Annual Usage	Monthly Credit
Equal to or greater than 12,000 kWh annually	\$40
7,500 – 12,000 kWh annually	\$25
Less than 7,500 kWh annually	\$15

Order Point 3 of the Commission's August 8, 2022 Order requires OTP to file an annual report beginning 90 days after the first completed program year, including information like participant counts, average bills and bill credits, disconnection, and reconnection information. The first full program year will be 2023, so the first report will be filed in 2024. Staff will include information on the Uplift program in the 2023 SRSQ, filed and decided upon by the Commission in 2024.

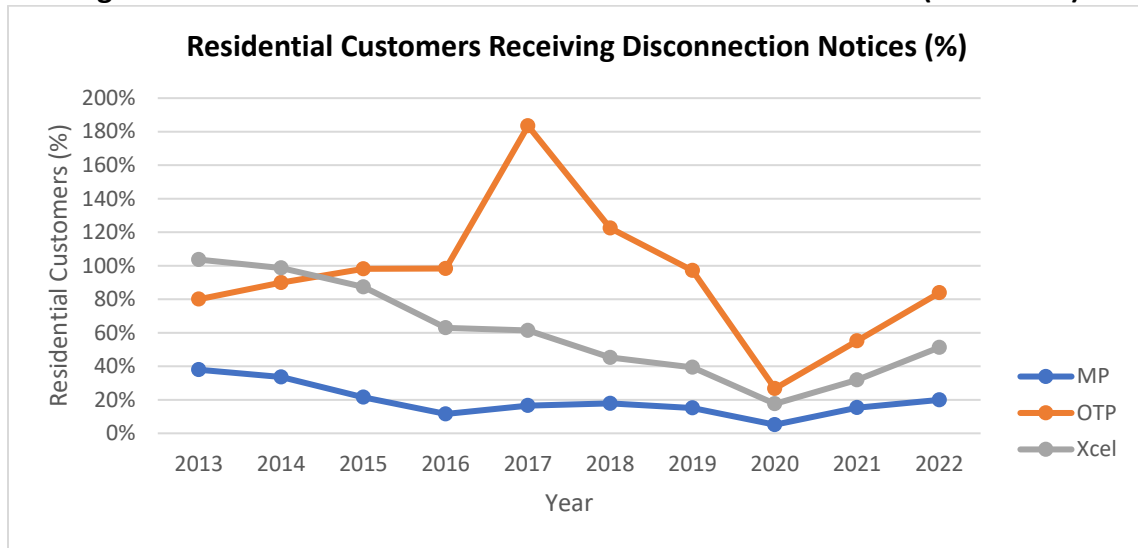
⁷⁸ Docket No. E-017/M-23-76 (MP) Department comments, June 16, 2023, Table 10, p. 18.

⁷⁹ MP Rate Book 13.07, Electric Rate Schedule, Uplift Program Rider, p. 2 of 3.

(https://www.otpc.com/media/owsjl03d/mn_1307.pdf)

Overall Staff Analysis on Involuntary Disconnections

Figure 14: Disconnection Notices Sent to Residential Customers (2013-2022)

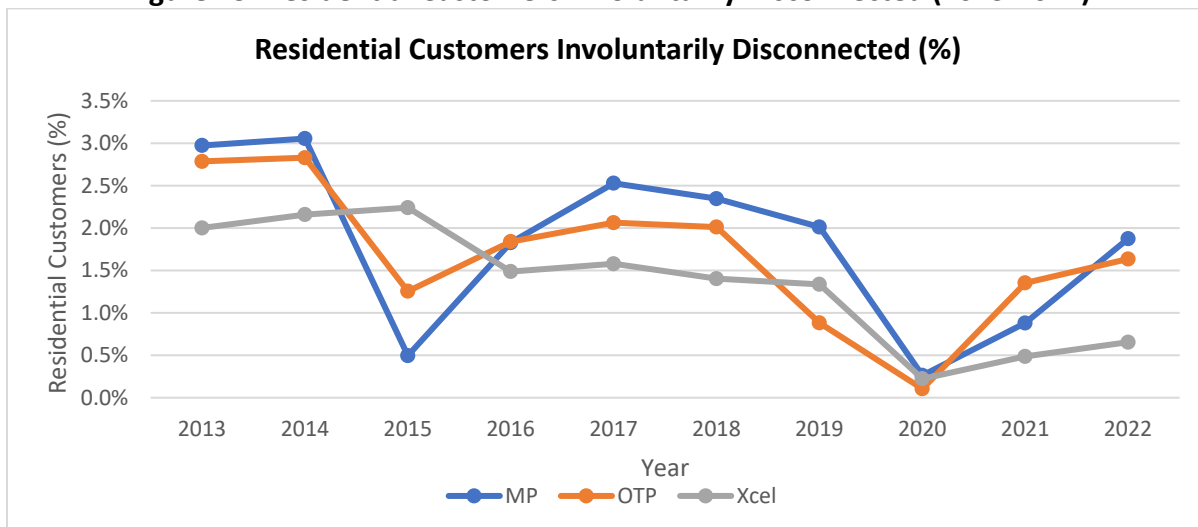


The above figure shows an increase in the number of disconnection notices sent as compared to recent years; however, Staff is not concerned, because the percentage of notices sent is at pre-pandemic levels or below.

The figure also demonstrates that some customers receive multiple notices of disconnection, shown especially by values greater than 100%. The Commission’s Consumer Affairs Office (CAO) has interpreted this to mean that even after working with their utility to become current on their bill by settling arrears or establishing a payment plan, customers may fall behind again.

Data in the above and below figures can only show how many notices were sent and how many customers were disconnected; available data cannot explain how many unique customers were “warned” with a disconnection notice and then avoided disconnection.

Figure 15: Residential Customers Involuntarily Disconnected (2013-2022)



The above figure displays that utilities are largely marching in step with one another regarding involuntary disconnections across the last ten years.

The disconnection moratorium ended in August 2021. Utilities only began sending notices and making disconnections in the second half of 2021, but largely only during August and September. In October 2021, CWR season began, so the utilities had less than two months to perform involuntarily disconnections, and therefore collect inflated past due amounts coming out of the COVID-19 pandemic, under non-CWR circumstances.⁸⁰ Staff theorizes that the rebound in disconnects occurred in May 2022, allowing the companies four months outside of CWR season to collect arrears, as compared to two months in 2021. Therefore, in 2022, involuntary disconnections have risen from 2021, returning to similar numbers as 2019 prior to the COVID-19 pandemic.

Table 7: Residential Involuntary Disconnections by Month Following the COVID-19 Disconnection Moratorium (August 2021-December 2022)⁸¹

Months ⁸²	Xcel	MP	OTP
August 2021	2,506	329	369
September 2021	1,642	402	262
October 2021	1,038	56	28
November 2021	721	94	24
December 2021	385	68	19
January 2022	408	96	15
February 2022	307	80	37
March 2022	418	127	37
April 2022	252	102	44
May 2022	1,630	273	234
June 2022	1,073	370	128
July 2022	893	282	101
August 2022	1,063	281	131
September 2022	1,058	202	114
October 2022	548	88	2
November 2022	535	70	6
December 2022	353	56	4

With the exception of Xcel (and that difference is negligible), arrears have decreased in 2022 as compared to 2021. In the 2021 SRSQ briefing papers, Staff noted that OTP customers' arrears most dramatically increased during the pandemic as compared to Xcel and MP. Staff now notes that the average arrears for OTP has decreased by ~\$91, which is an encouraging change.

⁸⁰ Note that while utilities do have the ability to perform disconnections during the CWR season under MN Stat. § 216B.096, there are more limits to doing so and therefore are less likely to disconnect customers from service, with Xcel ceasing all disconnections entirely.

⁸¹ SRSQ Reports in Docket Nos. 22-162 and 23-73 (Xcel), 22-163 and 23-75 (MP), and 22-159 and 23-76 (OTP)

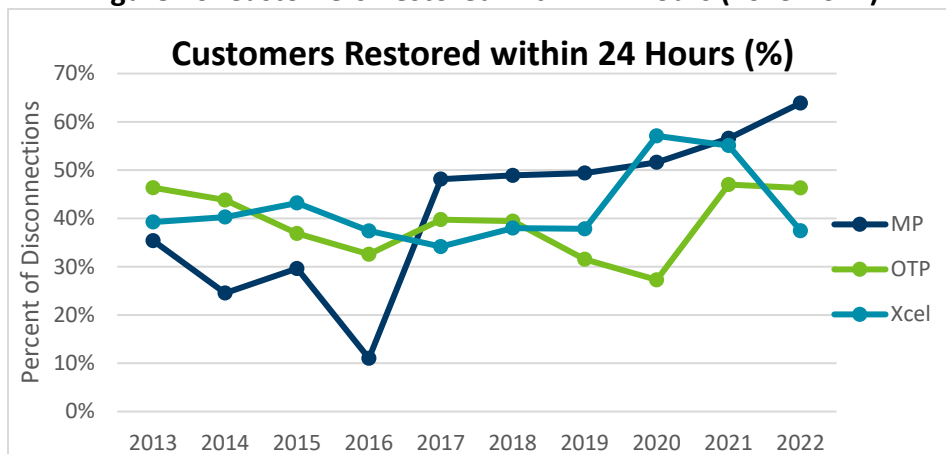
⁸² CWR months are shaded in gray.

Table 8: Past Due Residential Customers(##) and Average Amount Past Due (\$)⁸³

	Oct 2019		Oct 2020		Oct 2021		Oct 2022	
	Customers in Arrears (#)	Average Arrears (\$)	Customers in Arrears (#)	Average Arrears (\$)	Customers in Arrears (#)	Average Arrears (\$)	Customers in Arrears (#)	Average Arrears (\$)
Xcel	177,053	\$238	182,408	\$407	177,254	\$453	184,990	\$468
MP	13,633	\$150	13,604	\$271	13,920	\$292	12,980	\$220
OTP	16,029	\$65	8,424	\$322	7,388	\$240	6,958	\$149

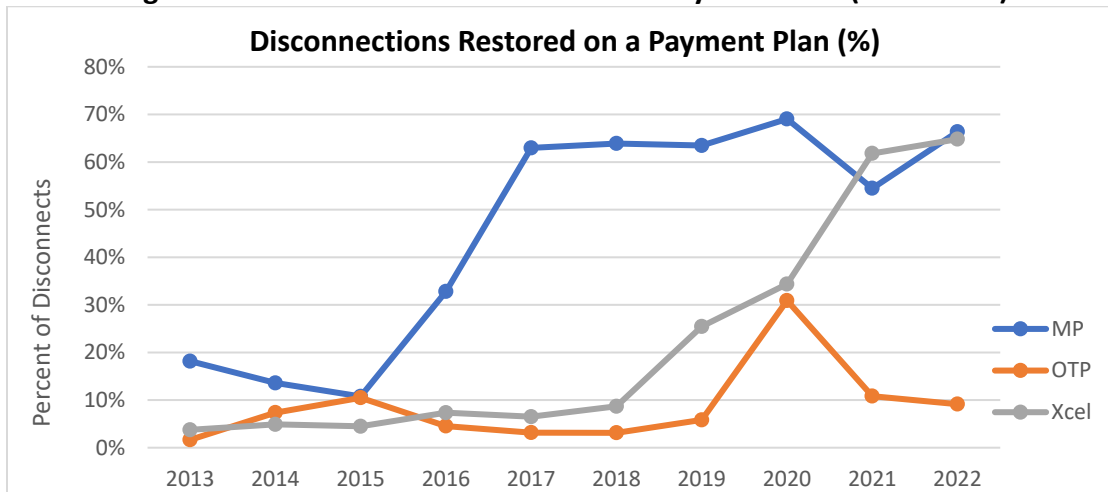
Restoration times are varied between the three IOUs utilities, and there is no clear pattern. MP has been positively increasing its restoration times since 2017; OTP’s restoration times are even in the last two years; Xcel’s restoration times decreased in 2022 as it is replacing its meter system.

Figure 16: Customers Restored within 24 Hours (2013-2022)



The figure below shows percentage of disconnections restored for customers on a payment plan. Staff is curious as to why less than 10% of OTP’s restorations are based on a payment plan. In OTP’s 2023 SRSQ, Staff would like more information and will continue to monitor this.

Figure 17: Disconnections Restored on a Payment Plan (2013-2022)



⁸³ To create this table only, Staff included additional data from filings in Docket Nos. 19-2 and 20-375.

C. 7826.1600 Service Extension Request Response Times

Table 9: Reporting Required by MN Rule 7826.1600

Utility	Requests to locations <u>NOT</u> previously served and time until ready for service (#)	Requests to locations previously served and time until ready for service (#)
Xcel	✓	✓
MP	✓	✓
OTP	✓	✓

The Department acknowledged that OTP, MP, and Xcel fulfilled the requirements of Minnesota Rules 7826.1600.⁸⁴

Xcel

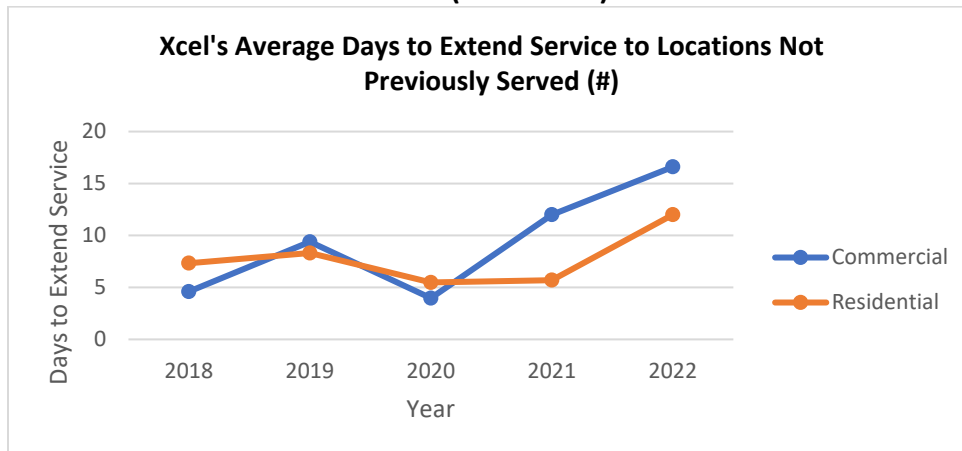
Previously Served Locations

Xcel reported 217,130 service requests to previously served locations in 2022. These were all handled on the next business day. There was an increase from 2021's 212,410 service requests to previously served locations.

Locations Not Previously Served

In 2022, Xcel had a total of 4,521 new residential service requests with an average 12 days to complete from customer to site ready and 225 new commercial service requests with an average of 16.6 days to complete.

Figure 18: Xcel's Average Number of Days to Extend Service to Locations Not Previously Served (2018-2022)⁸⁵



Xcel stated that the number of new service installations decreased and attributed this to ongoing economic challenges related to the COVID-19 pandemic, inflation, and material and

⁸⁴ 23-73 (Xcel) Department of Commerce comments, June 16, 2023, p. 13; 23-75 (MP) Department of Commerce comments, June 16, 2023, p. 24; 23-76 Department of Commerce comments, June 16, 2023, p. 20.

⁸⁵ 23-73 (Xcel) report, March 31, 2023, Table 2, p. 8.

supply chain issues. Xcel states that it anticipates an increase in service installations in the future as these challenges subside. Xcel states that it has discontinued its old process for new service installations and is working on creating “a new Service Lead-Time process” for 2023.⁸⁶

The time taken for Xcel to respond to requests for new service installations has increased, and therefore worsened, over the past three year average. Similar patterns were shown for commercial customers. Xcel stated “the residential and commercial response times in 2022 were the highest the Company had provided since at least 2009 (12.0 days and 16.6 days respectively).”⁸⁷

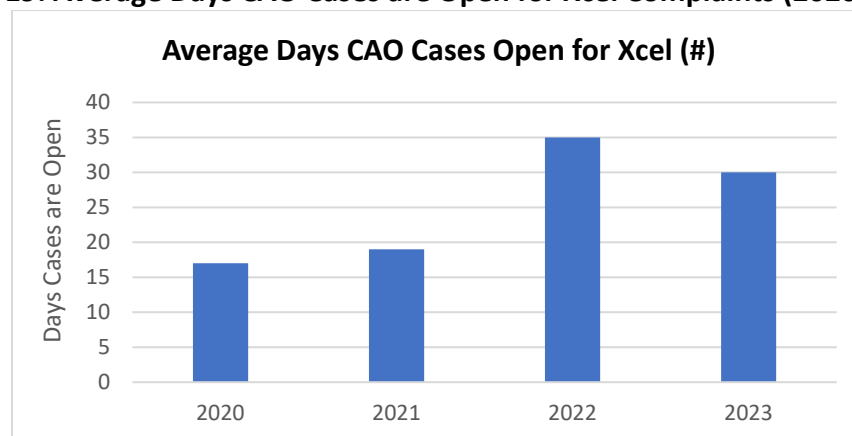
The Department requested Xcel explain why installation times for new service extensions declined in 2022. Xcel responded citing weather impacts, significant storm events, complexity of the work, job site readiness, an increase in 30% lead times for electrical materials due to shortages of raw materials, and the manual nature of the old procedure for tracking service extension requests.⁸⁸

The Department will be monitoring Xcel’s supply chain constraints and how that affects higher service extension response times for both residential and commercial customers.⁸⁹ Staff will continue to monitor this metric as well.

CAO Complaints Regarding Locations Not Previously Served

CAO fielded complaints from Xcel customers regarding new service installations. In one case, a multi-unit housing developer had experienced numerous delays and nonresponses from Xcel regarding transformer installation and other issues. In October 2023, Commission leadership raised concerns with Xcel about the complaint in question, as well as what appeared to be a pattern of communication delays and nonresponses from the Xcel Advocacy Team to CAO.

Figure 19: Average Days CAO Cases are Open for Xcel Complaints (2020-2023)⁹⁰



⁸⁶ 23-73 (Xcel) report, March 31, 2023, p. 9.

⁸⁷ 23-73 (Xcel) Department comments, June 16, 2023, p. 13.

⁸⁸ 23-73 (Xcel) Xcel reply comments, June 30, 2023, p. 2.

⁸⁹ 23-73 (Xcel) Department reply comments, September 25, 2023, p. 2.

⁹⁰ 2022’s spike in average case days is likely attributed to Xcel’s email encryption, which locked CAO out of email receipt, and therefore, led to slower processing times.

Over time, Xcel's complaint cases must remain open for a longer period to be adequately resolved per CAO's standards. CAO can cite many instances of follow-up emails where CAO had to request a response.

Staff recommends the Commission require Xcel to provide response times to CAO and external parties regarding new service installations and how the Xcel Advocacy Team will be trained to work with CAO on new service installation efforts in its 2023 service quality report. (**Decision Option 10**) Staff would ideally see an improvement in response times to CAO regarding new service installations in 2023.

MP

Previously Served Locations

In 2022, MP served 413 residential customers at locations that were previously served; two of those locations did not meet the goal date. The two late installations were requested on a Friday, and MP performed the work on the following Monday. 24 commercial customers were connected at locations that were previously served, and none of them experienced late connections.

Locations Not Previously Served

In 2022, MP extended new service to 816 residential customers and 116 commercial customers. 76% of new service extensions met the service dates requested by the customer. The remainder were not met due to supply chain issues/material shortages/workforce shortages/scheduling (8.4%), customer not ready (7.9%), and weather (2.6%).⁹¹

Table 10: MP Service Extension Times for Locations Not Previously Served (2019-2022)⁹²

	Year	Requests (#)	On date requested	1-10 days later	11+ days later
Residential	2019	787	43%	25%	32%
	2020	929	54%	30%	16%
	2021	1050	81%	13%	6%
	2022	816	78%	13%	9%
Commercial	2019	723	25%	37%	38%
	2020	711	54%	20%	26%
	2021	382	79%	12%	9%
	2022	116	63%	13%	24%

⁹¹ 23-75 (MP) report, March 31, 2023, p. 86.

⁹² 23-75 (MP) report, March 31, 2023, Figures 22 and 24, p. 84. Results rounded up to the nearest whole percent.

OTP

Previously Served Locations

OTP extended service to 1,312 residences that had been previously served. 1,162 of them had installations completed within 0-2 days. 162 of the total 178 small commercial installations were also completed within 0-2 days.

Table 11: OTP Service Extension Times for Locations Previously Served (2018-2022)⁹³

Year	Residential and Commercial requests (#)	On date requested	1-10 days later	11+ days later
2018	1,878	99%	1%	0%
2019	7,898	72%	28%	0%
2020	1,344	69%	31%	0%
2021	1,357	68%	31%	1%
2022	1,502	89%	10%	1%

2019 – 2022 saw a jump in the number of OTP’s service extension times that were completed 1-10 days after the request. Going from 1% in 2018, that number jumped up to hover around 30% for three years. In 2022, it has now lowered to 10%. Staff will continue to monitor this metric, however.

Locations Not Previously Served

In 2022, OTP extended service to 409 residential locations that it had not previously served, which is an increase over previous years. Of those, the majority installed service within 0-2 days.

Table 12: Installation Days for Customers Not Previously Served (2022)⁹⁴

Installation Timelines	Residential (#)	Small Commercial (#)
0-2 days	231	71
3-10 days	90	23
11-20 days	23	9
21+ days	65	13

More OTP customers were asking for new service installations, but at the time, the number of days needed to complete service to locations went down. In 2022, 58% of new service installations were performed on the date requested.

⁹³ Results rounded up to the nearest whole percent.

⁹⁴ 23-76 (OTP) report, March 31, 2023, p. 53.

Table 13: OTP Service Extension Times for Locations Not Previously Served (2019-2022)⁹⁵

Year	Residential and Commercial Requests (#)	On date requested	1-10 days later	11+ days later
2019	261	25%	56%	19%
2020	536	35%	65%	0%
2021	462	24%	51%	25%
2022	530	58%	21%	21%

D. 7826.1700 Call Center Response Times

Table 14: Reporting Required by MN Rule 7826.1700

Utility	Calls to business office, month-by-month breakdown (#)	Calls regarding service interruptions, month-by-month breakdown (#)	Total calls offered to agents and answered within 20 seconds (#)
OTP	All calls to call center shown in single table, by month.		✓
MP	All calls directed to agents unless re: interruptions.	All calls re: interruptions sent through IVR.	✓
Xcel	✓	✓	✓

The Department acknowledged that OTP, MP, and Xcel fulfilled the requirements of Minnesota Rules 7826.1600.⁹⁶

Minnesota Rules set a utility performance standard in which annually, 80% of calls made during business hours must be answered within 20 seconds. Calls made regarding service interruptions may be “answered” by connecting the customer to a recording that provides specified information. For calls to the business office using an automated call processing-system, like interactive voice response (IVR), the 20 second countdown clock begins when the customer has selected a menu option to speak to a live operator or representative.⁹⁷

Xcel

Xcel utilizes the following call types to answer customers:

- Residential call center representatives
- Business Solutions Center (BSC)
- Credit and Personal Account Representatives (PAR)
- Interactive Voice Response (IVR)

⁹⁵ 23-76 (OTP) Department comments, June 16, 2023, p. 20.

⁹⁶ 23-73 (Xcel) Department of Commerce comments, June 16, 2023, p. 15; 23-75 (MP) Department of Commerce comments, June 16, 2023, p. 26; 23-76 Department of Commerce comments, June 16, 2023, p. 20.

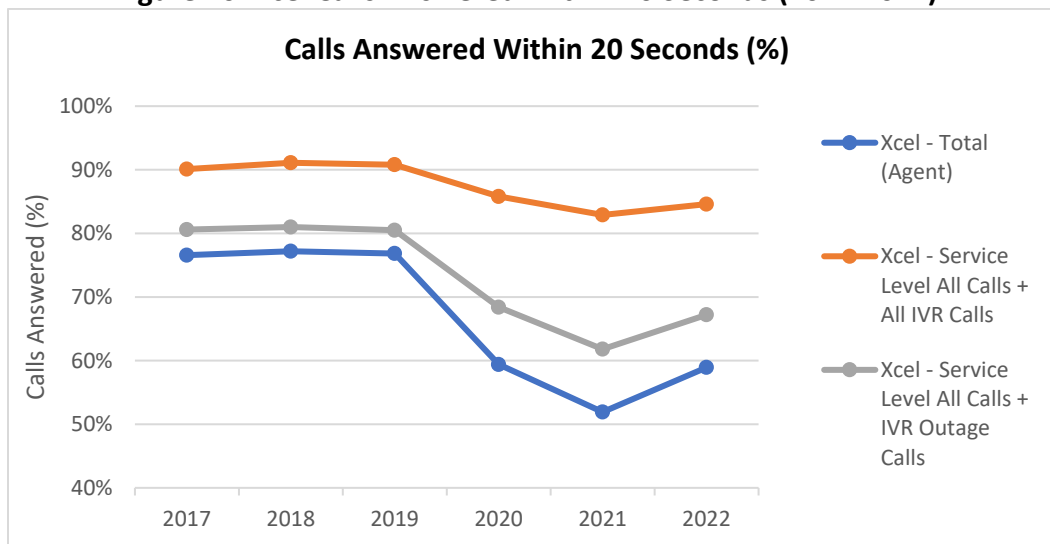
⁹⁷ Minn. Rules 7826.1200 Call Center Response Time, Subparts 1 and 2.

(<https://www.revisor.mn.gov/rules/7826.1200/>)

In 2022, 84.6% of IVR-only calls were answered in 20 seconds or less. 67.2% of calls answered by call center agents and IVR were answered in 20 seconds or less.⁹⁸

Xcel says that it worked to mitigate post-pandemic market pressures on contact center hiring and performance and that there was an improvement in Q3 and Q4 2022.

Figure 20: Xcel Calls Answered Within 20 Seconds (2017-2022)⁹⁹



The Department specifically addressed outage calls. Xcel assumes all IVR calls will be completed within 20 seconds. Calls answered by agents are answered less quickly.

Table 15: Xcel Calls Answered within 20 Seconds by Agents (2020-2022)¹⁰⁰

Year	Answered within 20 Seconds (%)
2020	58.9%
2021	51.3%
2022	58.9%

Xcel was attempting to improve its call center performance in 2022 but was facing absenteeism in 2021 due to COVID and a large amount of staff turnover.¹⁰¹

The Department writes that Xcel made the changes necessary to comply with this metric. However, the Department suggests that “if the Commission is interested in making the call response time requirement more stringent, then the Department suggests the Commission consider revising the call response metric in Xcel’s QSP tariff,” which provides penalties if the Company does not meet certain benchmarks.¹⁰² Xcel’s Quality of Service Plan (QSP) is discussed in more detail on pp. 34-36 of the briefing papers. The Department did not provide a specific

⁹⁸ 23-73 (Xcel) report, March 31, 2023, p. 10.

⁹⁹ 23-73 (Xcel) report, March 31, 2023, Attachment F.

¹⁰⁰ 23-73 (Xcel) Department comments, June 16, 2023, Table 6, p. 15.

¹⁰¹ 23-73 (Xcel) Department comments, June 16, 2023, p. 14.

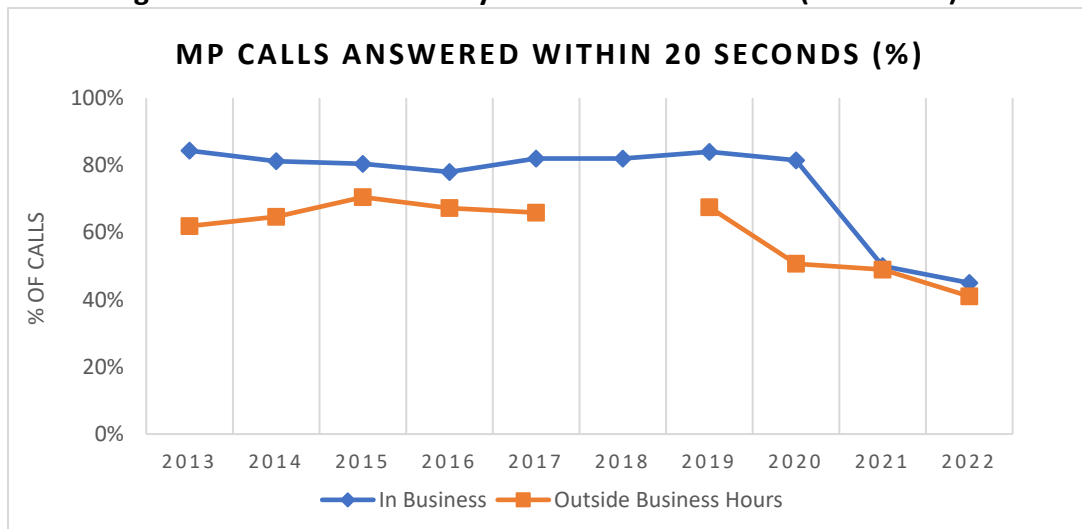
¹⁰² 23-73 (Xcel) Department comments, June 16, 2023, p. 4.

preferred call response metric to place in the QSP. Therefore, Staff did not include a decision option in the briefing papers but invites the Department to provide more information.

MP

MP answered 45% of calls during business hours within 20 seconds in 2022, which is lower than 2021's 50%.

Figure 21: Calls Answered by MP within 20 Seconds (2013-2022)¹⁰³



Note that MP fell below the performance target established in Minnesota Rules of 80% of calls answered within 20 seconds. MP said that its poor performance is due to COVID-19 impacts, residential rate transition to Time-of-Use (TOU), attrition in the Call Center, customer affordability program changes, and unplanned absences. Staff concludes that 2022 response times may be explained by involuntary disconnections and requests for CWR protections increasing.

The Department asked MP specifics about how return-to-work efforts have affected recruitment and retention. MP still allows remote work during power outages or inclement weather, or if the employee is under quarantine. However, MP stated that the majority of its candidates prefer working in-office.¹⁰⁴

The Department asked MP to provide data to benchmark MP against its peers regarding wages offered to call center employees. MP's call center employees are represented by the International Brotherhood of Electrical Workers Local Number 31 and its wages were \$23.17 – \$25.74 per hour. The Department said that these wages are competitive with other IOUs and on the higher end nationally.¹⁰⁵

¹⁰³ MP did not provide a value for the percent of calls offered outside of business hours in 2018. Prior to 2020, MP reported the % of All Calls Answered, but in 2020 switched to the % of All Calls Offered.

¹⁰⁴ 23-75 (MP) Department IR No. 14, pp. 1-3.

¹⁰⁵ 23-75 (MP) Department comments, June 16, 2023, p. 25.

The Department says that MP has made positive changes to its 2023 call center response times but says that many of the challenges that MP cites are not unique to 2022 so would like to see it monitored.¹⁰⁶

MP reported its early 2023 call response numbers, which demonstrates an improvement over 2022.

Table 16: Calls Answered within 20 Seconds by Agents (Jan – Jun 2023)¹⁰⁷

2023 Months	Answered within 20 Seconds (%)
Jan	78%
Feb	88%
Mar	79%
Apr	70%
May	66%
Jun	82%

So far in 2023, there is an average 77% of calls answered within 20 seconds. Two months in 2023 have exceeded the 80% standard, and two months were close. Regarding MP's call answer time improvements in 2023, the Department wrote that it:

...appreciates that the mitigation measures employed by the Company to address this performance deficiency will take time to fully materialize as new employees are onboarded and existing employees become more familiar with new processes put in place to increase the effectiveness of the call center, and while the Department expects performance to continually improve over the coming years and will closely track associated metrics to verify this it does not have any recommendations to further modify business practices of the utilities to improve call center response at this time.¹⁰⁸

Staff notes MP's call center response times for 2022 are even lower than 2021. In 2021, the Department and Staff were already concerned about slow response times. However, the call center response times for early 2023 are encouraging. Staff found that MP could continue making improvements and will monitor call center response times in the 2023 SRSQ.

OTP

In 2022, OTP answered 89% of calls within 20 seconds. OTP had a drop in average percentage answered within 20 seconds by month throughout 2022; however, at no time, did OTP drop below the 80% standard in Minn. Rules. OTP blamed this on multiple large outage events in May and June and staff turnover in Q4 2022, and therefore, longer call times. OTP is confident that its answer rate will improve.¹⁰⁹

¹⁰⁶ 23-75 (MP) Department comments, June 16, 2023, p. 26.

¹⁰⁷ 23-75 (MP) report, April 3, 2023, Attachment A.

¹⁰⁸ 23-75 (MP) Department letter, September 28, 2023, p. 2.

¹⁰⁹ 23-76 (OTP) report, April 3, 2023, pp. 61-62.

E. 7826.1800 Emergency Medical Account Status (EMS)

Table 17: Reporting Required by MN Rule 7826.1800

Utility	Customers requesting EMS (#)	Customers granted EMS (#)	EMS denials and explanation (#)
Xcel	✓	✓	✓
MP	✓	✓	✓
OTP	✓	✓	✓

The Department acknowledged OTP, MP, and Xcel's fulfillment of the requirements of Minnesota Rules, part 7826.1800.¹¹⁰

Xcel

As of January 2023, Xcel had 1,698 households certified for EMS status. 1,222 households newly requested EMS status, and 143 households were denied for not returning the form or the medical professional not certifying the form.

Xcel sent 862,000 outreach items, including emails, onserts, automated calls, and manual dials. It also sent 108,500 pre-printed application forms, promoting its Medical Affordability Program (MAP), which mirrors its PowerOn program, described on pp. 11-12 of the briefing papers.¹¹¹

The Department found that the percentage of Xcel customers with EMS is 14% lower in 2022 than in 2021. A higher number of customers requested EMS, but a lower percentage was granted it – 88%. When comparing 2022's numbers to the last ten years, the number of customers approved was lower than the 10 year average.¹¹²

Staff notes this large decrease in customers who were approved for EMS in 2022. Staff will be monitoring this number in 2023. Staff is particularly interested in why customers were denied and what Xcel is doing about it, i.e., whether Xcel reaches back out to customers who did not return the form and encourages them to do so.

MP

In 2022, 102 customers had EMS, and all were granted it. 246 customers were required to renew their status, and 77 customers were removed from EMS for non-renewal.¹¹³ MP does not seem to perform outreach regarding EMS, according to its report.

¹¹⁰ 23-73 (Xcel) Department of Commerce comments, June 16, 2023, p. 10; 23-75 (MP) Department of Commerce comments, June 16, 2023, p. 22; 23-76 (OTP) Department of Commerce comments, June 16, 2023, p. 17.

¹¹¹ 23-73 (Xcel) report, March 31, 2023, pp. 11-12.

¹¹² 23-73 (Xcel) Department comments, June 16, 2023, pp. 16-17.

¹¹³ 23-74 (MP) report, April 3, 2023, p. 101.

The Department says that 102 customers is a 73% increase in customers requesting EMS status.¹¹⁴ Staff finds this increase encouraging as EMS protects customers with medical concerns and therefore are particularly vulnerable to energy insecurity.

OTP

OTP reports that six customers have EMS. This is the same number of EMS customers OTP had in 2021 and 2020.¹¹⁵ OTP also does not seem to perform outreach regarding EMS, according to its report.

F. 7826.1900 Customer Deposits

Table 18: Reporting Required by MN Rule 7826.1800

Utility	Customers required to make a deposit as a condition of receiving service (#)
Xcel	✓
MP	✓
OTP	✓

The Department acknowledged OTP, MP, and Xcel's fulfillment of the requirements of Minnesota Rules, part 7826.1900.¹¹⁶

The Commission's May 26, 2021 Order in Docket No. 20-375 disallowed service deposits or down payments through April 30, 2022.¹¹⁷ The utilities were only able to collect deposits between May and December in 2022, which certainly affected these numbers. Staff will monitor if the number of customer deposits rise in 2023 when they are allowed in the entire year.

Xcel

Xcel requests deposits as a condition for service for customers declaring bankruptcy, requiring notifications from the bankruptcy court and/or customer of their bankruptcy position. In 2022, Xcel requested 237 deposits.¹¹⁸ The Department found that the number of customers were 55% below the 10-year average.¹¹⁹

¹¹⁴ 23-75 (MP) Department comments, June 16, 2023, p. 27.

¹¹⁵ 23-76 (OTP) report, April 3, 2023, p. 63.

¹¹⁶ 23-73 (Xcel) Department comments, June 16, 2023, p. 17; 23-75 (MP) Department comments, June 16, 2023, p. 27; 23-76 (OTP) Department comments, June 16, 2023, p. 21.

¹¹⁷ 20-375 Commission Order, May 26, 2021, Para 2.

¹¹⁸ 23-73 (Xcel) report, March 31, 2023, p. 12.

¹¹⁹ 23-73 (Xcel) Department comments, June 16, 2023, p. 17.

MP

MP reported that it ceased requiring deposits in 2014 but may reconsider reinstating the practice in the future.¹²⁰

OTP

Zero customers were required to make a deposit in 2022 as in 2021. OTP made the decision to stop requiring deposits coming out of the COVID-19 disconnection moratorium but may require them in the future.¹²¹

Staff finds that the overall decrease (Xcel) and cessation (MP and OTP) of customer deposits as a condition of service to be helpful to low-income customers seeking service, allowing them to pay more towards their actual energy bills. Staff will continue to monitor whether MP and/or OTP begin requiring deposits again.

G. 7826.2000 Customer Complaints

The annual service quality report must include a detailed report on complaints by customer class and calendar month, including at least the following information:

Table 19: Reporting Required by MN Rule 7826.2000

Utility	Complaints received (#)	Complaints alleging billing errors, inaccurate metering, wrongful disconnection, high bills, inadequate service, service-extension or restoration intervals, and any other issue involved in ≥5% of complaints (# & %)	Method and timing of resolution	Complaints forwarded to the Utility by the CAO for further action (#)
Xcel	✓	✓	✓	✓
MP	✓	✓	✓	✓
OTP	✓	✓	✓	✓

The Department acknowledges OTP, MP, and Xcel's fulfillment of the requirements of Minnesota Rules, part 7826.2000.¹²²

Below is a table showing how many complaints were made each year, how many were resolved immediately, and the top two most common complaints.

¹²⁰ 23-75 (MP) report, April 3, 2023, p. 102.

¹²¹ 23-76 (OTP) report, April 3, 2023, p. 64.

¹²² 23-73 (Xcel) Department comments, June 16, 2023, p. 19; 23-75 (MP) Department comments, June 16, 2023, p. 28; 23-76 (OTP) Department comments, p. 22.

Table 20: Complaints¹²³

Utility	Year	Total Complaints	Resolved Immediately (%)	Most Common Complaint	2 nd Most Common Complaint
Xcel	2019	756	14%	Inadequate Service (60%)	Wrongful Disconnection (17%)
	2020	430	14%	Inadequate Service (57%)	Billing Error (16%)
	2021	484	11%	Inadequate Service (57%)	Billing Error (17%)
	2022	634	9%	Inadequate Service (52%)	Billing Error (23%)
MP	2019	525	60%	High Bill (70%)	Inaccurate Meter Read (19%)
	2020	545	52%	High Bill (79%)	Inaccurate Meter Read (11%)
	2021	513	30%	High Bill (81%)	Inaccurate Meter Read (9%)
	2022	346	14%	High Bill (82%)	Billing Error (5.8%)
OTP	2019	28	54%	Other (68%)	High Bill (18%)
	2020	30	80%	Other (63%)	High Bill (30%)
	2021	113	94%	Billing Error (58%)	Other ¹²⁴ (31%)
	2022	109	82%	Other (50%)	High Bill (30%)

Xcel

In 2022, Xcel reported a total of 635 complaints (602 residential, 31 commercial, 1 government, and 1 industrial).¹²⁵ Most complaints were resolved within 10 days through compromise with the customer, followed closely by taking the action the customer requested. In 2021, Xcel reported a total of 484 and 430 in 2020; the resolution method and time followed the same pattern reported for 2022.

The Department asked Xcel why the number of formal complaints increased in 2022, while the number of complaints received in the Company's call center declined over that same period.¹²⁶ Xcel responded that the increase in formal complaints corresponded to the COVID-19 disconnection moratorium and resumption of collection processes, as well as high natural gas prices and customer complaints about it. Xcel updated its manual note-taking process in August

¹²³ Parenthesis display the percent of total complaints in that category for a specified reporting year.

¹²⁴ The "Other" category includes planned outages, third-party meter readers, payment or payment options, property damage, and reliability.

¹²⁵ The same complaint may, appropriately, be "double-counted" as it could be worked on by both Xcel's call center and CAG teams.

¹²⁶ 23-73 (Xcel) Department comments, June 16, 2023, p. 48.

and September 2021, so the decrease in complaints received to the call center is not necessarily a reduction in complaints but that its call center agents are no longer recording inquiries as complaints.¹²⁷ The Department accepted this explanation, adding to the argument that the total residential arrearages by the end of 2022 had risen to \$88.5 from \$44.9 million in 2019.¹²⁸

That increase of \$43.6 million highlights the severity of Xcel customers' arrearages coming out of the pandemic and the disconnection moratorium. Staff believes that this surely explains Xcel's increase in complaints.

DER Complaints

Xcel also included 50 total DER complaints.¹²⁹ Created through conversations with CAO, Xcel reports on three DER complaint categories as shown in Table 21 below. These customer complaints are from the Solar*Rewards Community, Solar*Rewards, and Minnesota Renewable*Choice programs and were referred to Xcel by CAO or the Minnesota Office of the Attorney General (OAG).

Table 21: 2022 DER Complaint Count Summary¹³⁰

Complaint Categories	Complaint Count
Billing <i>Complaints related to the solar bill presentation, not a Rule or tariff</i> <i>Customer disputes solar credit</i>	18
Interconnection <i>Customer states delay in meter set for billing</i> <i>Customer states construction for solar account is delayed</i> <i>Installer files complaint instead of customer</i>	18
Other <i>PUC inquiry</i> <i>Customer does not understand the installation of solar system</i> <i>Unable to classify the complaint in a specific category</i>	14
Total Complaints	50

QSP

Docket No. 12-383 holds Xcel's Quality of Service Plan (QSP) quarterly compliance reports. Historically, the QSP has strengthened Xcel's service quality standards and required monetary settlements to customers if performance thresholds are not met. One of the performance standards that Xcel must report on are all Xcel customer complaints to PUC. Customer complaint standard is ≤ 0.2059 complaints per 1,000 customers.

Regarding Xcel's QSP, in late December 2019, CAO received 129 complaints from solar installers regarding Xcel's solar interconnection process. In the 2019 report filed on May 1, 2020, the Company reported 396 complaints from CAO when the standard was 363, but asked that the

¹²⁷ 23-73 (Xcel) Xcel reply comments, June 30, 2023, p. 23.

¹²⁸ 23-73 (Xcel) Department letter, September 25, 2023, p. 3.

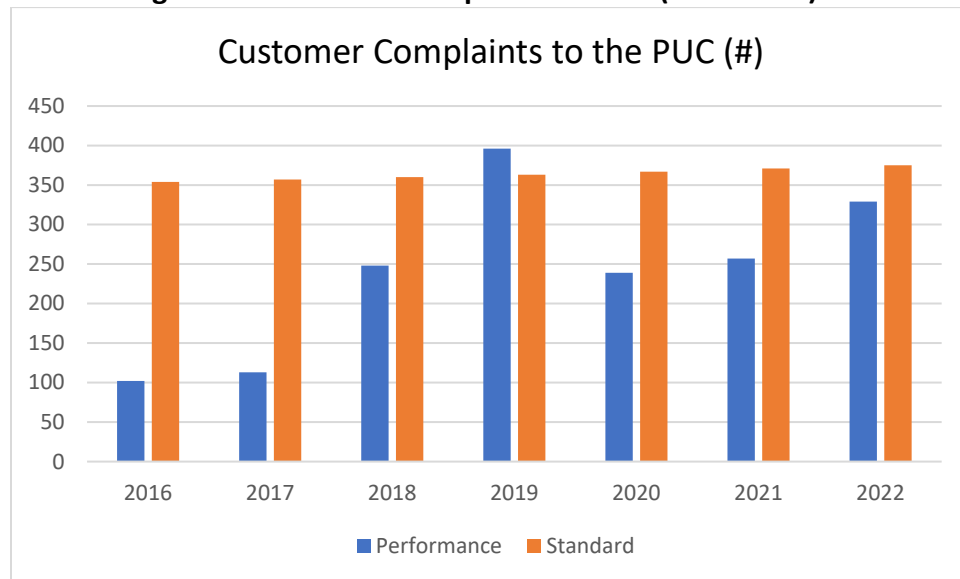
¹²⁹ 23-73 (Xcel) report, March 31, 2023, p. 15.

¹³⁰ 23-73 (Xcel) report, March 31, 2023, Table 5, p. 15.

Commission disallow the 129 complaints, stating that the solar installers were not “customers.” After Commission proceedings, the Commission denied Xcel’s request to not count the 129 complaints, required Xcel to work with stakeholders on resolving solar installation issues, and most significantly, voted to make Xcel subject to a \$1 million underperformance payment.

The Commission does not need to decide anything on the QSP at this time, but it should take note that the 2022 complaints to CAO are close to the standard. As part of 12-383, Staff will continue to monitor Xcel’s customer complaint numbers annually.

Figure 22: Customer Complaints to PUC (2016-2022)¹³¹



As compared to 2016-2021, the complaint performance came as close to the performance standard as 2019, when the performance exceeded the standard and Xcel was assessed a fine.

The City of Minneapolis (City) commented on complaints for Xcel related to DERs and the interconnection process.¹³² The City requests that Xcel uphold the Commission's November 9, 2022 Order in Docket No. 22-162, which requires active tracking of inquiries/complaints/disputes on DERs and the interconnection process as well as documentation of days to respond. The City requests that the Commission require Xcel to complete this tracking in its forthcoming 2023 SRSQ report. The City suggests that Xcel immediately share a tracking spreadsheet of DER complaints taken by the call center and other staff. Staff notes that Xcel is planning to provide a tracking spreadsheet of its 2023 DER complaints, filed in April 2024.¹³³

The Department provided comments on the City’s review of the 2022 QSP report, saying that it did not identify Xcel as non-compliant. The November 9, 2022 Order in Docket No. 23-162,

¹³¹ 12-383 2022 annual QSP report, April 27, 2023, p. 1.

¹³² 23-73 (Xcel) City of Minneapolis comments, June 16, 2023, p. 2.

¹³³ 22-162 et al (2022 SRSQ) Order, November 9, 2022, Order Point 6, p. 2.

where the requirement originated, did not require a starting date for collecting information, so Xcel's partial year reporting meets the requirement.¹³⁴

MP

In 2022, MP reported 297 complaints from its residential customers, which was 85.8% of the total complaints; 49 complaints were from commercial customers or 14.2%. The majority of customer complaints occurred in February, followed by March.¹³⁵

Also, MP reported 32 complaints from CAO in 2022, which is an 18% increase from the 27 complaints received from CAO in 2021.¹³⁶

The Department provided a table with a summary of MP's complaints between 2017 and 2022. Each of the below metrics in 2022 are either the highest or lowest numbers in the last six years. While some of these differences are minor, there was a significant drop in the number of complaints as compared to previous years, which is encouraging for future years. Staff will monitor the number of complaints in coming years to ensure that they are staying steady or decreasing.

Table 22: Summary of Customer Complaints (2017-2022)¹³⁷

Year	Complaints (#)	Billing Error	High Bill	Inadequate Service	Incorrect Metering	Service Restoration
2017	694	1.4%	77.8%	5.6%	13.1%	0.1%
2018	630	1.6%	68.1%	6.2%	22.4%	0.3%
2019	525	4.6%	69.3%	5.9%	19.2%	0.6%
2020	545	4.2%	78.7%	4.8%	11.2%	0.7%
2021	513	3.1%	81.5%	6.2%	9.2%	0%
2022	346 (Lowest)	5.8% (Highest)	81.9% (Highest)	4.6% (Lowest)	5.5% (Lowest)	1.2% (Highest)

55% of complaints were resolved within 10 days, 31% resolved in greater than 30 days, and 14% on the same day.

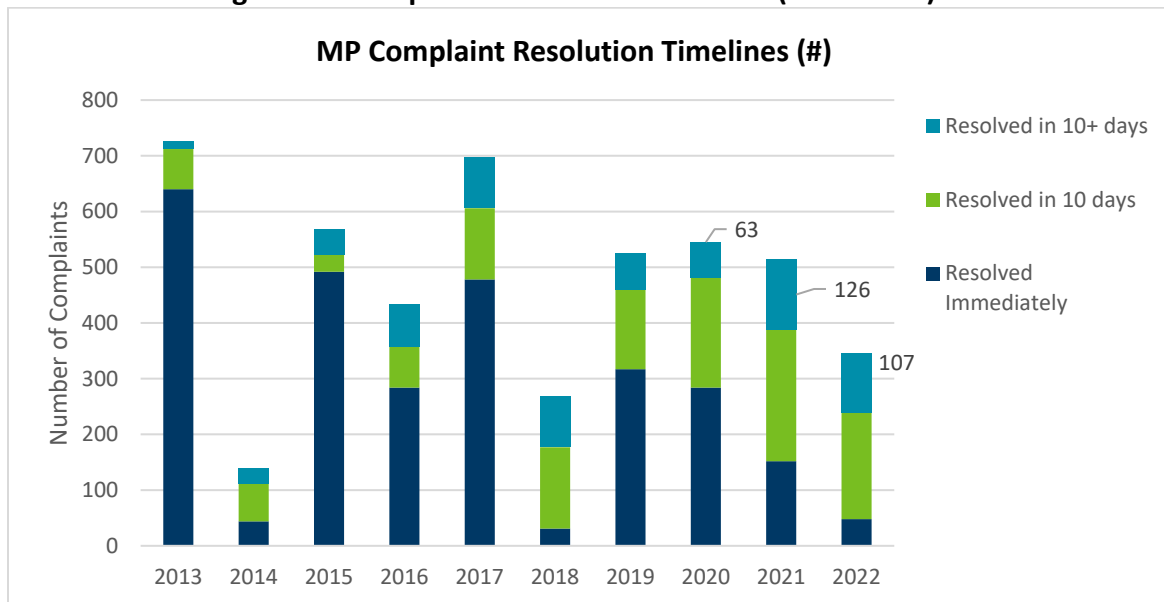
¹³⁴ 23-73 (Xcel) Department reply comments, June 30, 2023, p. 2.

¹³⁵ 23-75 (MP) report, April 3, 2023, p. 104.

¹³⁶ 23-75 (MP) Department comments, June 16, 2023, Table 14, p. 28.

¹³⁷ 23-75 (MP) Department comments, June 16, 2023, Table 14, p. 28.

Figure 23: Complaint Resolution Timelines (2013-2022)¹³⁸



Complaint resolution times have dropped since 2021. Staff is unsure why and would like to see clarity on the reasons behind the decreased resolution timeline.

OTP

OTP received 109 complaints in 2022, as compared to 113 in 2019. 113 was the peak since 2013, so 2022 saw a small drop but still a jump from historic values. Complaints for 2016-2020 hovered around 30 complaints per year. OTP received seven complaints from CAO.

Table 23: OTP Complaint Types (2022)¹³⁹

Complaint Type	Total Complaints	Percent of Total
Alleging billing errors	9	8.3%
Inaccurate meter reading	0	0%
Wrongful disconnection	6	5.5%
High bills	33	30.3%
Inadequate service	3	2.8%
Service extension intervals	0	0%
Service restoration intervals	3	2.75%
Other	55	50.5%
<i>Planned outages</i>		
<i>Third-party meter readers</i>		
<i>Payment or payment options</i>		
<i>Property damage</i>		
<i>Reliability</i>		
Total	109	100%

¹³⁸ 23-75 (MP) report, April 3, 2023, Table 46, p. 106.

¹³⁹ 23-76 (OTP) report, April 3, 2023, Table 34, p. 67.

OTP explains the increase is due to an enhancement to the complaint reporting process within its customer information system. Training has been completed.¹⁴⁰ The Department points out that OTP did not include information on how the enhancement and training “materially impacted the volume of complaints received.”¹⁴¹

OTP responded to the Department’s inquiry, saying that it needed to increase training touch points on complaints and the steps for logging complaints. OTP has implemented an annual refresher and bumped up complaint training in its Customer Service Representative (CSR) training. OTP does say that “calls that our CSRs take may not always have a clear indication of a complaint, CSRs use their best judgment when logging the complaint.”¹⁴²

82% of complaints were resolved on the initial inquiry, which is better than Xcel and MP.

Table 24: OTP’s 2022 Resolution Timelines¹⁴³

Resolved by	Percentage
Resolved on initial inquiry	82%
Resolved within 10 days	14%
Resolved in greater than 10 days	5%

Most complaints were resolved by taking the action that the customer requested (40%), followed by compromising with the customer (21%). Staff suspects that OTP’s flexibility when dealing with customer complaints has a direct correlation to its quick inquiry resolutions.

Table 25: Actions Taken by OTP to Resolve Customer Complaints¹⁴⁴

Action Taken	Percentage
Took the action the customer requested	40%
Took an action the customers and the utility agree is an acceptable compromise	28%
Provided the customer with information that demonstrates that the situation is not reasonably within control of OTP	21%
Refused to take the action the customer requested	10%

Service Quality Work Group

In 2019, Staff noticed that high percentages of complaints were categorized under seemingly ambiguous titles like “Other” and “Inadequate Service.” In response, all three electric IOUs were ordered to file revised categories for reporting customer complaint data, following consultation with Department and Commission Staff.¹⁴⁵ The group, including representatives from utilities, the Commission’s CAO, and the Department, met four times and ultimately

¹⁴⁰ 23-76 (OTP) report, April 3, 2023, p. 67.

¹⁴¹ 23-76 (OTP) Department comments, June 16, 2023, p. 22.

¹⁴² 23-76 (OTP) reply comments, June 30, 2023, p. 3.

¹⁴³ 23-76 (OTP) report, April 3, 2023, Table 35, p. 66.

¹⁴⁴ 23-76 (OTP) report, April 3, 2023, Table 36, p. 67.

¹⁴⁵ 20-401, 20-404, 20-406, Order, December 18, 2020, Para. 16.

created a shared set of complaint sub-categories, which add specificity and consistency to complaint reporting per Minnesota Rule 7826.2000. At its last meeting, in March 2022, the group agreed to continue to assess “fit” of new sub-categories, including those for “inadequate service” and to create a shared glossary to define the new sub-categories.

For further detail on this final meeting, MP explained:

In the March 2022 meeting, utilities provided further details on the practical application of complaint categories they used. There was discussion to find consensus on categories and application for reporting in SRSQ. Ultimately, parties agreed to additional detail for reporting of the category “Inadequate Service,” as listed in Minnesota Rule 7826.2000. Utilities will break out Inadequate Service into:

- Field/Operations
- Customer Service
- Programs and Services
- Cold Weather Rule Protection

Beginning with the 2023 SRSQ Annual Report, filed in April of 2024, the utilities would report on the agreed-upon customer complaint categories. The utilities will include a table of the agreed upon complaint categories, definitions of what falls into those categories, and count of complaints by category.¹⁴⁶

Of note, the Department interpreted complaint sub-categories to be ready for implementation with the Utilities’ 2023 filings concerning data for 2022.¹⁴⁷

Staff wishes to flag that OTP’s largest percent of complaints were coded as “Other.” Staff had similar concerns regarding the 2021 annual reports. Thus, Staff’s concerns were not alleviated as there remains a lack of specificity in the complaints recorded as “Other” despite the group having made changes to the category “Inadequate Service.”

Finally, following the Commission’s Order regarding 2020 Service Quality data, the group also discussed Xcel’s inclusion of distributed energy resources (DER) complaints in its complaint reporting.¹⁴⁸ Xcel, in discussions with the group, specifically the Commission’s CAO, defined the following new subcategories:

- 1) Billing
 - Complaints related to the solar bill presentation not a rule or tariff
 - Customer disputes solar credit
- 2) Interconnection
 - Customer states delay in meter set for billing
 - Customer states construction for solar account is delayed.

¹⁴⁶ MP initial filing, April 1, 2022, pp. 90-91. OTP agreed with the use of the new categories, explaining their understanding that the four subcategories for inadequate service would be first used in the April 2024 filing, as also stated in OTP’s initial filing, Docket No. E017/M-22-159, April 1, 2022, p. 65.

¹⁴⁷ 22-159 Department comments, May 16, 2022, p. 25.

¹⁴⁸ 21-230, 21-225, and 21-237 Order, December 2, 2021, Para 6.

- Installer files complaint instead of customer
- 3) Other
- PUC Inquiry
 - Customer doesn't understand the installation of the solar system
 - Unable to classify the complaint in a specific category

H. Website and Other Electronic Communications

Beginning with data for 2020, the Commission ordered utilities to provide greater detail on electronic means of customer communication, beyond utility call centers.¹⁴⁹ To establish a baseline, utilities were ordered to provide information on electronic utility-customer interactions. More, beginning in April 2023, utilities were ordered “to provide percentage uptime and error rate percentage information in their annual reports for the next three reporting cycles, to build baselines for additional web-based service metrics.”¹⁵⁰

Table 26: Reporting Required by Commission Order¹⁵¹

Utility	Website visits (#)	Logins via electronic customer communication platforms (#)	Emails or other electronic communication received, categorized by subject (#)	Uptime and error rate for website, payment services, and outage info (%)
Xcel	✓	✓	✓	✓
MP	✓	✓	✓	✓
OTP	✓	✓	✓	✓

¹⁴⁹ 20-401, 20-404, and 20-406, Order December 18, 2020, Para. 14.

¹⁵⁰ 21-230, 21-225, and 21-237 Order, December 2, 2021, Paras. 2-4.

¹⁵¹ 23-73 (Xcel) Department reply comments, September 25, 2023, p. 3; 23-75 (MP) Department reply comments, September 28, 2023, p. 2; 23-76 (OTP) Department comments, June 16, 2023, p. 27.

Table 27: Yearly Total Electronic Customer Communication

Utility	Year	My Account	Website	Social Media ¹⁵²	Emails	Total Calls to Call Center
Xcel ¹⁵³	2020	15,910,472	12,673,590		235,210	2,555,155 ¹⁵⁴
	2021	17,818,268	14,351,582		121,679	2,493,516
	2022	14,458,009	10,669,980		83,952	2,663,988
MP	2020	339,242	1,314,540	35,111	12,722	133,453 ¹⁵⁵
	2021	490,667	1,598,725	62,333	16,927	142,306
	2022	850,123	1,879,499	17,329	16,320	153,607
OTP	2020	N/A	2,349,795	32,983	2,294	55,180
	2021	72,108	2,314,977	37,705	5,701	53,747
	2022	44,453	1,370,745	86,036	9,579	56,022

Table 28: Most Frequently Reported Email Categories (2022)

Xcel ¹⁵⁶	MP	OTP ¹⁵⁷
Billing Inquiry (36%)	Fuel Assistance ¹⁵⁸ (46%)	Meter Readings (58%)
Start/Stop/Transfer (21%)	Miscellaneous (14%)	Starting service (14%)
My Account (12%)	Billing Inquiry (11%)	Changing mailing address (7%)

¹⁵² Social Media could include Facebook, Instagram, LinkedIn, and/or Twitter.

¹⁵³ The data used in this table represents Xcel's revised data filed in the Company's Reply Comments on June 24, 2022, and thus, are not reflected in the Department's comments below.

¹⁵⁴ Xcel's measure includes all calls offered to agents plus IVR answered billing and outage calls.

¹⁵⁵ MP's measure includes calls made during and outside of business hours. OTP's measure does not include abandoned calls.

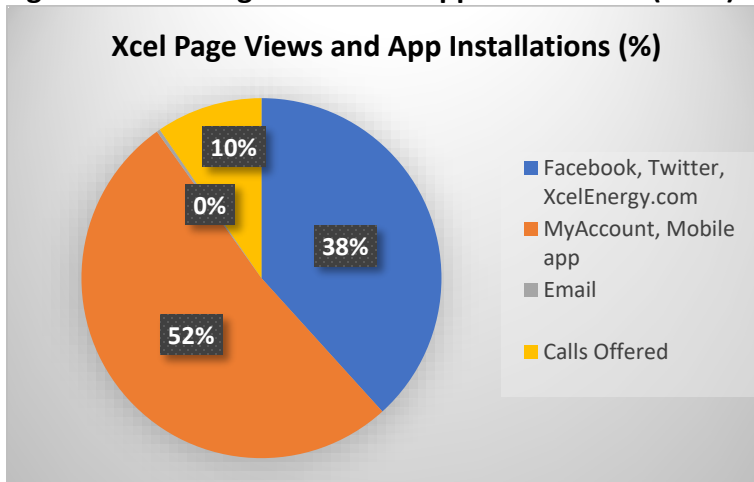
¹⁵⁶ For Xcel and MP, the most frequent subjects reported in 2022 were the same as those reported in 2021 and 2020.

¹⁵⁷ For OTP, the most common categories were the same in 2022 and 2021; in 2020, meter reading was again a frequent email type but enrollment in even monthly payment and My Account were also frequent topics.

¹⁵⁸ MP initial filing, April 1, 2022, p. 63. Emails categorized as fuel assistance pertain to energy assistance inquiries. Separate categories are used for emails about Customer Affordability of Residential Electricity ("CARE") affordability program and disconnect/reconnects but fewer than 100 emails were received in these categories.

Xcel

Figure 24: Xcel Page Views and App Installations (2022)¹⁵⁹



Xcel noted a decrease in contact through its 2022 electronic channels. In late 2022, Xcel found that its Contact Us form and customerservice@xcelenergy.com address required multiple contacts and/or a phone call to resolve the customer’s issue. Xcel removed the Contact Us form and adjusted its email design, which now has self-service options and invites the customer to call. Xcel worked with the OAG and CAO, who are both satisfied with the changes.¹⁶⁰ Xcel’s percentage uptime was nearly 100% in 2022.¹⁶¹

The Department says that the electronic customer contacts were down across the board in 2022 as compared to 2021. The Department asks Xcel to explain this trend. Xcel did not find a single, clear factor but believes that it was a combination of utility protections and moratoriums, limiting move in/move out inquiries due to eviction moratoriums, and a shift of customers away from digital contact with the Company to the phone. Additionally, MyAccount and the mobile app transitioned to a new platform in 2022.¹⁶²

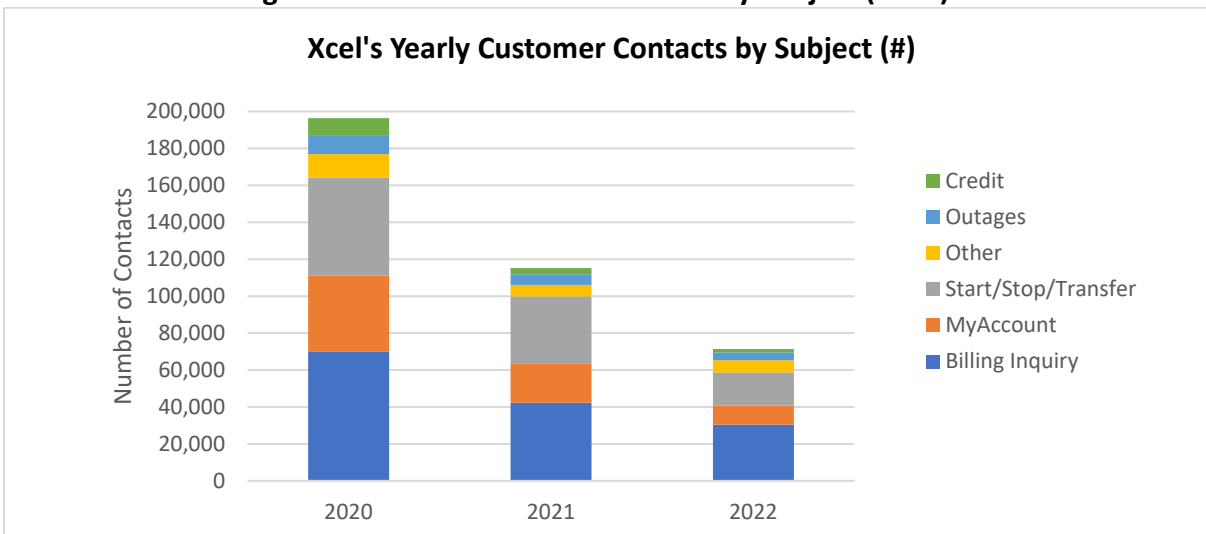
¹⁵⁹ Xcel includes Facebook and Twitter with their count of website visits. “Calls offered” are calls to agents as well as all outage and billing calls handled by IVR.

¹⁶⁰ 23-73 (Xcel) report, March 31, 2023, p. 18.

¹⁶¹ 23-73 (Xcel) report, March 31, 2023, p. 17.

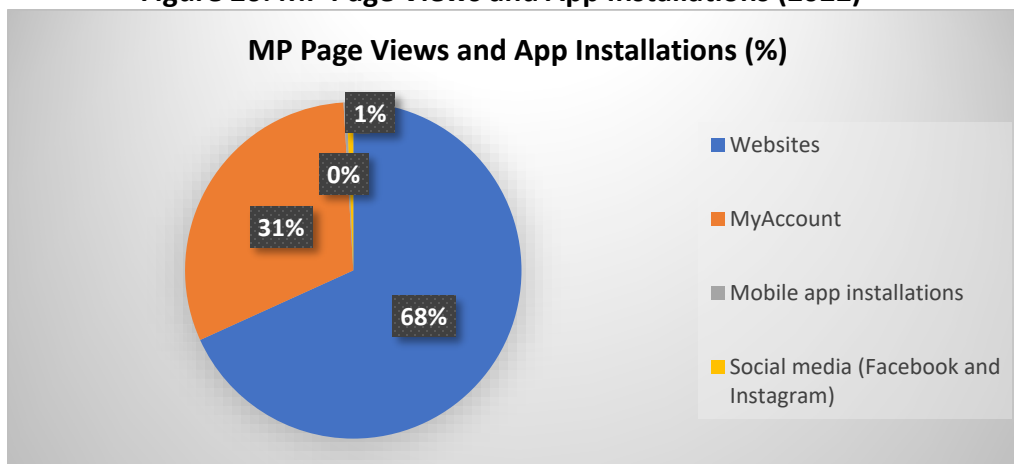
¹⁶² 23-73 (Xcel) Xcel reply comments, June 30, 2023, p. 4.

Figure 25: Xcel’s Customer Contacts by Subject (2022)¹⁶³



MP

Figure 26: MP Page Views and App Installations (2022)¹⁶⁴



MP saw a significant increase in usage of its MyAccount website and a significant decrease in Instagram engagement. The differences between 2021 and 2022’s electronic email and social media contact are below:

Table 29: MP 2022 Electronic Email and Social Media Contact vs. 2021¹⁶⁵

Description	Difference between 2021 and 2022 (%)
Website	17.6%
MyAccount	73.6%
Mobile app installations	-2.1%
Facebook	-48.7%

¹⁶³ 23-73 (Xcel) report, March 31, 2023, Attachment G.

¹⁶⁴ 23-73 (MP) report, April 3, 2023, Table 30, p. 70.

¹⁶⁵ 23-75 (MP) Department comments, April 16, 2023, Table 23, p. 35.

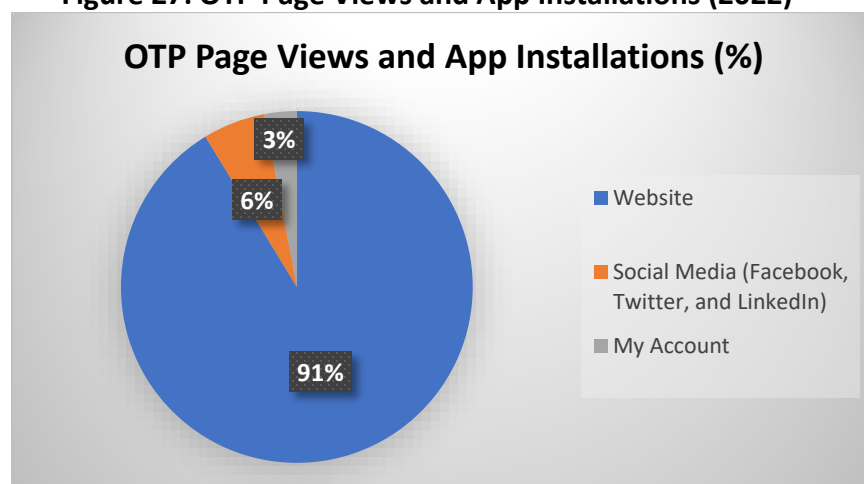
Instagram	-96.5%
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The majority of emails received through MP's customerservice@mnpower.com for the past three years were regarding fuel assistance. Staff would be interested to know about how quickly these emails are answered and the typical response to a customer asking about fuel assistance.

The Department viewed “these increased levels of interaction as a positive”¹⁶⁶ but wants more information regarding MP’s plan to drive more traffic to Facebook and Instagram or when MP will no longer utilize social media. MP said that by not engaging in Meta’s new insights dashboard sooner, the participation and engagement figures were understated in 2022. Between 2021 and 2022, engagement has increased for both Facebook and Instagram.¹⁶⁷ MP’s average percentage uptime for its website, outage reporting, outage map, Speedpay system, and MyAccount was nearly 100%.

OTP

Figure 27: OTP Page Views and App Installations (2022)¹⁶⁸



OTP’s main electronic customer communications are done through their website, followed by MyAccount. OTP acknowledged that its website visit numbers are inaccurate though in 2022, because Google Analytics was down without the Company’s knowledge, so its tracked visit counts are lower than reality.¹⁶⁹ Staff will monitor web analytics provided by OTP in 2023. OTP was able to report on percentage uptime, which was nearly at 100%.

¹⁶⁶ 23-75 (MP) Department comments, June 16, 2023, p. 36.

¹⁶⁷ 23-75 (MP) MP reply comments, June 30, 2023, p. 4.

¹⁶⁸ 23-76 (OTP) report, Table 15, April 3, 2023, p. 40.

¹⁶⁹ 23-76 (OTP) report, April 3, 2023, p. 40.

I. Public Facing Summaries

In response to Commission Order,¹⁷⁰ all three utilities submitted a public facing summary.¹⁷¹ The Commission's November 9, 2022 Order in the 2021's SQSR reporting dockets requested that utilities place the public facing summary within one click of its homepage.¹⁷² Staff was able to find OTP's¹⁷³ and MP's¹⁷⁴ summaries on their websites with some effort, but they were not one click from the home page. However, Staff was unable to find Xcel's summary on its website.

J. Xcel's Locational Reliability and Equity Information and Interactive Map

Xcel provided a link to its Locational Reliability and Service Quality Data map.¹⁷⁵ The Commission's May 18, 2023 Order in Docket No. 20-406 found that the map met all requirements required by the Commission, including "low-income energy efficiency program participation and energy bill assistance program participation."¹⁷⁶ Xcel is analyzing map data and will present results to the Commission in its April 2024 service quality report.

K. Xcel's Customer Satisfaction Scores

The Department stated that Xcel "did not meet any of the five annual customer satisfaction goals identified in 2022."¹⁷⁷ These goals involve call center staff (transactions with agents over the phone, emails, and IVR), so the Department does not find it surprising that the goals were not met considering Xcel's difficulties with its call center over the last two years.

Xcel's J.D. Power Survey measures customer satisfaction on seven metrics:¹⁷⁸

- Overall Customer Satisfaction Index
- Power Quality and Reliability
- Price
- Billing and Payment
- Corporate Citizenship
- Communications
- Customer Contact

Regarding Xcel's J.D. Power survey, the Department said that each of the seven satisfaction metrics had declined, which represents a decline in residential customer satisfaction over the last three years. The Department acknowledged that some of the decline can be attributed to higher oil and natural gas prices after the Russian invasion of Ukraine in 2022.

¹⁷⁰ 21-230; 21-225; 21-237 Order, December 2, 2021, Para 7.

¹⁷¹ 23-73 (Xcel) report, March 31, 2023, Section II, Attachment H, p. 79 of PDF; 23-75 (MP) report, April 3, 2023, pp. 14-15; 23-76 (OTP) report, April 3, 2023, Attachment 2, pp. 79-80 of PDF.

¹⁷² 22-163, 22-159, 22-162 Order, November 9, 2022, Order Point 6.

¹⁷³ <https://www.otpc.com/media/iqrhkw/w/2022-srsq-public-facing-summary-report.pdf>

¹⁷⁴

<https://minnesotapower.blob.core.windows.net/content/Content/Documents/Company/Transmission/SRSQ%202022.pdf>

¹⁷⁵ <https://xeago.maps.arcgis.com/apps/webappviewer/index.html?id=6b87f4d407864b939bcea05aad05bdd1>

¹⁷⁶ 20-406 Order, May 18, 2023, Point 1.

¹⁷⁷ 23-73 (Xcel) Department comments, June 16, 2023, p. 23.

¹⁷⁸ 23-73 (Xcel) report, Section I, March 31, 2023, p. 22.

The Department requested that Xcel provide more information about the 2022 results for the residential customer class survey. Xcel explains the decline by increased monthly bills since 2020 due to recent inflation. 32% of residential customers indicated their financial status had declined in the past year, and only 14% indicated their financial situation was better off.¹⁷⁹

IV. Staff Analysis

Staff has made analyses throughout each section of the briefing paper. In this final section, Staff will highlight areas where the Commission may monitor, request more information during the agenda meeting, and/or take further action.

Broadly, after reviewing each utility's filing, Staff concludes that service provided to customers in 2022, despite still coming out of a global pandemic, was reported in accordance with Minnesota Rules, met or exceeded performance expectations of Rules in most instances, and often improved to align with pre-pandemic levels. As such, Staff concur with the utilities and the Department that the Commission should accept each utility's 2022 report (**Decision Option 1**).

A. Metrics to be Monitored in the 2023 Reports

Table 30 below displays all of the metrics that Staff will be monitoring in future SRSQ reports.

Table 30: Metrics to the Monitored in the 2023 SRSQ Reports

Metrics	Xcel	MP	OTP
Involuntary Disconnections	<p>Xcel saw an 87% increase of customers receiving disconnection notices as compared to the 2019-2021 average. While this may be attributed to the disconnection moratorium ending, Staff will monitor this metric in 2023.</p> <p>Xcel has made the independent decision to auto-enroll LIHEAP customers in PowerOn that have both electric and natural gas service. Staff expects that participation will rise, so Staff will monitor PowerOn participation</p>	<p>MP has said that its Remote Reconnect Pilot will begin to realize the benefits of the Pilot program in coming years due to delays in COVID-19. Staff will monitor whether involuntary disconnections decrease as more remote reconnections expand.</p>	<p>OTP said that 379 customers were granted CWR status out of 444 requests, explaining that the remaining 65 had chosen other payment plans. Staff would like more information about all of OTP's payment plan options.</p> <p>Staff noted that less than 10% of OTP's restorations were done through a payment arrangement with the customer, which is a decrease from 2022. Staff will watch this metric for improvement.</p>

¹⁷⁹ 23-73 (Xcel) Department letter, September 25, 2023, p. 3.

	and if there is any effect on involuntary disconnections.		OTP's Uplift Program will be reporting on its activities 90 days after its first full year. Staff will include this information in future reports.
Service Extension Requests	Xcel is experiencing delays in service extensions due to supply chain constraints. Staff will be monitoring Xcel's supply chain constraints and how that affects higher service extension response times for both residential and commercial customers.	N/A	Across 2019-2021, 30% of OTP's service extensions were completed between 1-10 days. It has now lowered to 10% in 2022. Staff will monitor this metric.
Call Center Response Times	N/A	MP's call response time (45%) is far below the performance target in Minn. Rule (80%). MP already has made positive changes to its 2023 call center response times, but Staff will continue monitoring to see if MP's call response time improves.	N/A
EMS	10% of Xcel's EMS applicants are denied. Staff is interested in why these customers were denied and what Xcel is doing about it, i.e., whether Xcel reaches back out to customers who did not return the form and encourage them to do so. Staff asks Xcel to address this in the 2023 SRSQ report.	N/A	N/A
Customer Deposits	Commission Order did not allow service deposits through April 2022. Xcel is only collecting deposits	MP is not charging deposits as of its April SRSQ report but said that they will continue to	OTP is not charging deposits as of its April SRSQ report but said that they will continue to

	for customers declaring bankruptcy. Staff will monitor if the number of deposits rises in 2023 when Xcel can collect through the whole year and if Xcel will be requiring deposits for customers not in bankruptcy proceedings.	evaluate whether it wants to charge deposits in the future. Staff will monitor whether they begin requiring deposits in 2023.	evaluate whether it wants to charge deposits in the future. Staff will monitor whether they begin requiring deposits in 2023.
Customer Complaints	While it is not in the SRSQ, Staff will monitor QSP complaints in 2023 and will include any relevant data in the 2023 SRSQ briefing papers.	MP's customer complaint metrics in 2022 were all the highest or lowest they have in the last six years. Staff will monitor all customer complaint metrics in 2023's SRSQ report, but in particular, will focus on whether complaints will continue to be low and billing errors will continue to be high.	N/A
Website and Other Electronic Communications	N/A	N/A	Staff will monitor OTP's web analytics in 2023, now that they have been corrected.
Public Facing Summaries	Staff was unable to find Xcel's public facing summary on its website. Staff will monitor whether Xcel adds this information to its website in the 2023 SRSQ report.	N/A	N/A

B. Missing Involuntary Disconnection Information in 2022 Reports

There were three metrics regarding involuntary disconnections that Staff flagged for more information coming out of Xcel's 2021 report. This information was not included in the 2022 Report filed. Staff includes the three metrics below and asks for the information in the utilities' 2023 Reports.

- 1) Staff asked if Xcel's customers were receiving more than one disconnection notice and that is elevating the disconnection notice metric. In 2023, Xcel did not provide the total number of disconnection notices sent or how many households received more than one disconnection notice. Instead, Xcel provided the number of customers that received a

disconnection notice in 2022. Staff notes that there was an increase in customers receiving disconnection notices, rising from approximately 350,000 in 2021 to approximately 650,000 in 2022.

- 2) Staff also flagged that in Xcel's 2021 report, it had an increase in payment arrangements made. Staff was wondering if Xcel had lesson learned to share with other utilities, but Xcel did not provide this information.
- 3) Staff asked about the relationship between the Utilities' use of payment plans and 24 hour restorations. No utilities included this information in their 2022 reports.

V. Decision Options

1. Accept Otter Tail Power's, Minnesota Power's, and Xcel Energy's 2022 Safety, Reliability, and Service Quality reports. *(Xcel, MP, OTP, Department, Minneapolis)*

Volume 1 Decision Options

Staff note: a supplemental filing is required after the IEEE benchmarking data is posted, as that does not happen until after the April 1 filing deadline. This is consistent with last year's reports and included in the decision options setting each utility's benchmarking standards for 2023. Decision Options 2-4 maintain the same IEEE benchmarking comparisons (e.g. 2nd quartile and utility size) for the utility's 2022 and 2023 reliability standards.

2. Set Minnesota Power's 2023 statewide Reliability Standard at the IEEE benchmarking 2nd Quartile for medium utilities. Set Minnesota Power's work center reliability standards at the IEEE benchmarking 2nd quartile for small utilities. Require Minnesota Power to file a supplement to its 2023 SQSR report 30 days after IEEE publishes the 2023 benchmarking results, with an explanation for any standards the utility did not meet. *(Minnesota Power, Department)*
3. Set Otter Tail Power's 2023 statewide Reliability Standard at the IEEE benchmarking 2nd Quartile for medium utilities. Set Otter Tail's work center reliability standards at the IEEE benchmarking 2nd quartile for medium utilities. Require Otter Tail to file a supplement to its 2023 SQSR report 30 days after IEEE publishes the 2023 benchmarking results, with an explanation for any standards the utility did not meet. *(Otter Tail Power, Department)*
4. Set Xcel Energy's 2023 statewide Reliability Standard at the IEEE benchmarking 2nd Quartile for large utilities. Set Xcel's Southeast and Northwest work center reliability standards at the IEEE benchmarking 2nd quartile for medium utilities. Set Xcel's Metro East and Metro West work center reliability center standards at the IEEE benchmarking 2nd quartile for large utilities. Require Xcel to file a supplement to its 2023 SQSR report 30 days after IEEE publishes the 2023 benchmarking results, with an explanation for any standards the utility did not meet. *(Xcel, Department)*

5. Set a goal, to be phased in over time, for Xcel Energy to meet the IEEE benchmarking 1st Quartile for large utilities in a future year. *(Minneapolis)*
6. Direct Xcel to create a plan to close the locational reliability gap so that customers being served on the poorest performing feeders are brought to comparable levels of service based on a rolling three-year historic average. *(Minneapolis)*
7. Direct Xcel to provide an analysis of the incremental costs associated with achieving IEEE first quartile performance that includes a discussion of timeframes, costs, and benefits in their SRSQ 2024 filing. *(Department, Staff)*
8. Require Xcel to discuss how to lower the difference in SAIDI, SAIFI, and CAIDI between feeders associated with the different customer classes in their 2024 filing, including costs and benefits to implementation. This requirement ends on December 31, 2024, unless the Commission changes or extends it. *(Staff)*
9. Clarify that Minnesota Power is required to provide CEMI (3, 4, 5, 6) and CELI (6, 12, 24), storm included, and storm excluded, for their overall system, as well as their individual service regions, until such time the Commission changes or rescinds this requirement. *(Staff)*

Staff recommends Decision Options 1-4, 7-9.

Volume 2 Decision Options

10. Require Xcel Energy to document response times to CAO and external parties regarding new service installations and how the Xcel Advocacy Team will be trained to work with CAO on new service installation efforts. Require Xcel to report this information in its 2023 service quality report. *(Staff)*

Staff recommends Decision Option 10.