

Revised Decision Options – 2023 SRSQ Reports, All Volumes

PUC Docket Nos. E002/M-24-27, E015/M-24-29, E017/M-24-30

November 7, 2024, Agenda Item 1

The following document compiles decision options filed by ECC/CUB and Xcel. Staff also offers revisions to Decision Option 21 and Decision Option 23.

1. Accept Xcel Energy, Minnesota Power, and Otter Tail Power Company's 2023 Safety, Reliability, and Service Quality Reports. *(Xcel, MP, OTP, Department)*

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 2024. Decision Options 2-4 maintain the same IEEE benchmarking comparisons (e.g. second quartile and utility size) for the utilities' reliability standards.

2. Set Minnesota Power's 2024 statewide Reliability Standard at the IEEE benchmarking second Quartile for medium utilities. Set Minnesota Power's work center reliability standards at the IEEE benchmarking second quartile for small utilities. Require Minnesota Power to file a supplement to its 2024 SRSQ 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 2024 statewide Reliability Standard at the IEEE benchmarking second Quartile for medium utilities. Set Otter Tail's work center reliability standards at the IEEE benchmarking second quartile for medium utilities. Require Otter Tail Power to file a supplement to its 2024 SRSQ 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 2024 statewide Reliability Standard at the IEEE benchmarking second Quartile for large utilities. Set Xcel Energy's Southeast and Northwest work center reliability standards at the IEEE benchmarking second quartile for medium utilities. Set Xcel's Metro East and Metro West work center reliability center standards at the IEEE benchmarking second quartile for large utilities. Require Xcel Energy to file a supplement to its 2024 SRSQ report 30 days after IEEE publishes the 2024 benchmarking results, with an explanation for any standards the utility did not meet. *(Xcel, Department)*

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5. Direct Minnesota Power and Otter Tail Power to include a discussion on alternative approaches to reliability standard setting in their 2024 SRSQ Reports. *(Department)*
 - a. Direct Minnesota Power and Otter Tail Power to include a discussion on the IEEE reporting sample size and data exclusion challenges from this year. *(Staff)*
 - b. Direct Minnesota Power and Otter Tail power to include a discussion of using the EIA 861 data to benchmark utility reliability performance. *(Staff)*
6. Direct Otter Tail Power to include in its 2024 SRSQ report performance data for 2024 from both its Interruption Monitoring System (IMS) and their Outage Management System (OMS), if available. *(Department)*
7. Direct MP to include a discussion on the impact of its new OMS on reporting metrics and a comparison of data from its existing OMS system and its new OMS data, as available, in its 2024 SRSQ Report. *(Department)*

Volume 2 Decision Options

8. Accept Xcel Energy's compliance report on metrics regarding its Emergency Medical Account as ordered in Docket No. E-002/M-22-233. *(Xcel, Department, ECC/CUB)*

STAFF 8a. Require Xcel Energy to include an analysis and summary data based on the data points below for 2024 with its next SRSQ due April 1, 2025 report to better determine if there are areas for improvement in shortening service timelines. *(Staff as modified by Xcel, Staff does not oppose Xcel's amendments)*

- Type of new service request (based on Request Type such as Service, Extension, Relocate/Lower Facilities, etc. and Value Characteristic such as Commercial Retail, Other Building, etc.)
- Date of new service request
- Requested new in-service date
- ~~Date Customer Information Packet Sent (if the data was populated)~~
- ~~Date Customer Payment received~~
- Date Meter installed
- Date Service connected
- ~~Whether distribution system upgrades were necessary, and if so, the cost and type of upgrade~~

STAFF 8b. Require Xcel Energy to report service extension timelines by work center in future SRSQ reports. *(Staff, Xcel)*

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Volume 3 Decision Options

Disparities in Service Quality

Disconnection Variance

9. Grant Xcel Energy's request for a temporary extension of the variance to Minn. Rule 7820.2500 regarding AMI disconnection as approved in the Commission's March 22, 2023 Order in Docket No. E-002/M-22-233. (*Xcel, Department, ECC/CUB*)
 - a. Extend the variance until the Commission issues a decision on the variance request as presented in the 2024 SRSQ report. (*Xcel, ECC/CUB*)
 - b. Apply the extended variance retroactively starting from the expiration of the previous variance on April 22, 2024. (*Xcel, ECC/CUB*)
10. Deny Xcel Energy's request to extend its variance and perform remote disconnections. (*GECs*)
11. As a condition of extending the remote disconnection variance, eliminate voicemail messages as a permissible form of final contact before remote disconnection for Xcel Energy. (*GECs, Fresh Energy*)
12. Increase the existing threshold of final contact for disconnection to require Xcel Energy to use two methods of electronic communication, including either text message or email in addition to voicemail where the Company has received customer consent to do so. (*Xcel as revised, Department, ECC/CUB*)

Disconnection Moratorium

13. Require Xcel Energy to halt all disconnections until Xcel has implemented a plan to address disparities and has specifically demonstrated that remote disconnection does not increase the disparities. (*GECs, Sierra Club, OAG*)
14. Require Xcel Energy to halt all disconnections for customers in very low-income census block groups with high concentrations of POC until Xcel has implemented a plan to address disparities and has specifically demonstrated that remote disconnection does not increase the disparities. (*Fresh Energy, alternative to service territory disconnection*)
15. Require Xcel Energy to work with interested stakeholders to evaluate the impact of a moratorium on the Automatic Bill Credit Pilot. (*Department*)
16. Require Xcel Energy to work with interested stakeholders to evaluate the financial effects of a moratorium on disconnections over a two-year period. (*Department*)

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Outreach

17. Approve Xcel Energy's proposal to identify customers throughout its service territory that have not received LIHEAP assistance and are carrying past due balances, and approve the Company's proposal to perform targeted outreach to the identified customers. *(Xcel, Department)*
18. Require Xcel Energy to perform additional outreach throughout its service territory with the goal of increasing participation in affordability programs that reduce bad debt. *(Staff interpretation of Edina, Xcel, GECs)*

Policy Transparency

19. Require Xcel to publish its disconnection and payment agreement policies and practices on its website. Subject to technical feasibility, Xcel shall make the edits discussed in ECC/CUB's September 12, 2024 comments to its payment agreement webpage. *(Xcel, Department, ECC/CUB)*
20. Require Xcel to make a filing in the instant docket and Docket E,G-999/PR-24-02 detailing its current disconnection policies and practices, and require Xcel to submit additional filings in Docket E,G-999/PR-24-02 when there are changes to those policies and practices within 20 days of the Order. *(Xcel, Department, ECC/CUB)*

Additional Strategies

21. Approve Xcel Energy's proposal to restore power for involuntarily disconnected customers with AMI during the duration of a heat advisory or excessive heat warning issued by the National Weather Service. *(Xcel, Department, CUB/ECC, GECs)*
- STAFF 21a.** Xcel shall promptly inform the commission's Consumer Affairs Office of when it plans to reconnect disconnected customers due to a heat advisory or excessive heat warning. At that time, Xcel shall provide the following information, to the extent known:
- i. the location of the heat advisory or excessive heat warning
 - ii. the number of customers who will have power temporarily restored
 - iii. the expected duration of the power restoration
 - iv. the date and time at which power will be disconnected after the heat advisory or excessive heat warning ends *(Staff)*
- STAFF 21b.** Xcel shall notify customers who will be temporarily reconnected with the duration of the reconnection and expected end of the event. *(Staff)*
- STAFF 21c.** Xcel Energy shall submit a draft of the customer notice for Commission approval within 30 days of the order in the docket. The Commission delegates to the Executive Secretary the authority to approve the customer notice. *(Staff)*

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STAFF 21d. Require Xcel to file a summary of the number of extreme heat events, how many customers were temporarily reconnected, and whether the commission's Consumer Affairs Office was notified in future SRSQ reports. *(Staff)*

22. Require Xcel Energy to restore power for involuntarily disconnected customers with AMI when AQI alerts of 151 or higher have been issued. *(GECs)*

CUB/ECC 22A. Require Xcel to conduct additional outreach and provide customers with information about how to request medical protections if they are particularly vulnerable to poor air quality. *(CUB/ECC, Xcel)*

23. Require Xcel Energy to reduce its down payment requirements and modify its disconnection and payment agreement practices to include consideration of individual household financial circumstances. *(Xcel, CUB/ECC, Fresh Energy)*

STAFF REVISED 23. Require Xcel Energy to reduce its down payment requirements and modify its disconnection and payment agreement practices to include consideration of individual household financial circumstances. Xcel must offer at minimum the down payment percentage amounts in Table 4 of Staff briefing papers but may offer lower down payment plans as warranted by consideration of individual household circumstances. *(Staff)*

CUB/ECC 23A. Affirm that Minn. Stat. § 216B.096, subs. 5(a), 5(c), and 10(1), as well as Minn. Stat. § 216B.098, subd. 3 require the utility to negotiate payment agreement terms, including any down payment, individually with each customer based on the customer's financial circumstances and any extenuating circumstances of the household. *(CUB/ECC, Xcel)*

CUB/ECC 23B. Require Xcel to detail in its annual SRSQ report the average down-payment amount received from customers—both as a percentage of arrears and as a total dollar value—during CWR and non-CWR months. Xcel shall also explain how it has implemented the statutorily required consideration of both financial and extenuating circumstances during CWR and non-CWR months. *(CUB/ECC, Xcel)*

24. Prohibit Xcel Energy from sending disconnection notices until a customer's balance reaches \$180 past due. *(Xcel, Department, CUB/ECC, GECs)*

25. Prohibit Xcel Energy from disconnecting customers with a past due balance below \$300. *(Xcel, Department, CUB/ECC, GECs)*

26. Require Xcel Energy to wait at least 10 days after sending a disconnection notice before disconnecting a customer. *(Xcel, Department, CUB/ECC)*

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27. Require Xcel to evaluate implementing the following policies and to file the evaluation by April 1, 2025 in its 2024 SRSQ report. (*Staff interpretation of GECs, Xcel, CUB/ECC, Xcel supports docket and date deadline*)
- a. Restoring power to involuntarily disconnected customers with AMI when AQI alerts of 151 or higher have been issued. (*Xcel*)
 - b. Setting the reconnection fee at \$0. The evaluation shall include an estimate of the costs of waiving reconnection fees and how the Company would propose to recover those costs. (*Staff interpretation of GECs and Xcel*)
 - c. Elimination of interest payments on late bill payment fees or donation of those fees to low-income customer assistance programs, similar to the approach used by Xcel in Colorado. (*GECs, Xcel*)
 - d. A proposal to increase the number of customers receiving pre-weatherization, weatherization, and energy efficiency improvements, including deep retrofits to create greater energy savings, in areas within the Company's service territory with high concentrations of people of color being disconnected. The proposal should include year over year targets designed to increase the number of people receiving energy efficiency measures. (*Fresh Energy*)
- XCEL REVISED d.** A proposal to increase the number of customers receiving pre-weatherization, weatherization, and energy efficiency improvements, including deep retrofits to create greater energy savings, in areas within the Company's service territory with high energy burden. ~~concentrations of people of color being disconnected.~~ The proposal should include year over year targets designed to increase the number of people receiving energy efficiency measures. (*Xcel*)
- e. A more robust hot-weather rule to prevent disconnections in months with the highest cooling energy burden. (*Staff interpretation of GECs, Xcel*)
 - f. Creating an off-season LIHEAP program to help income-qualified residents clear their arrears by self-attesting to their income level. (*Xcel*)
28. Require Xcel to verify that it manages disconnections due to a landlord's failure to pay consistent with the requirements in Minn. R. 7820.1400. (*GECs, Xcel*)
29. Require Xcel Energy to inform affected personnel of racial disparities in electric service. Require Xcel to file a compliance report with its annual SRSQ filing on which employees received the training and what information was provided. (*Fresh Energy*)
30. Allow Xcel to track increased bad debt from any adopted proposals and request an adjustment to its revenue requirement in its next rate case. (*Xcel, ECC/CUB*)
31. Where not otherwise noted, require Xcel to file any necessary revised tariff changes within 30 days of the Commission's Order. (*Staff, ECC/CUB, Xcel*)

Reliability

32. Require Xcel Energy to file an enhanced vegetation management plan for areas disparately impacted by long duration outages. (*Xcel, City of Minneapolis*)
- a. Require Xcel to file the proposal with its IDP due November 1, 2025. (*Staff*)

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33. Require Xcel to file an enhanced vegetation management plan with a cost–benefit analysis with its IDP due November 1, 2025. In its filing, Xcel shall explain its analysis of the following to determine whether insufficient vegetation management was a causal factor in the identified disparities: *(OAG)*
 - a. Whether it found a correlation of CELI-12 problem areas with the location of infected trees using the Company’s data combined with Department of Agriculture data.
 - b. Whether the areas identified CELI-12 disparities correlate to higher levels of tree canopy than other areas.
 - c. Whether vegetation outages caused the larger number of outages in the identified clusters of CELI-12 outages.
34. Require Xcel Energy to file a proposal to develop a targeted undergrounding plan for portions of North Minneapolis, South Minneapolis, and the area surrounding downtown St. Paul. (Xcel, City of Minneapolis)
 - a. Require Xcel to file the proposal with its IDP due November 1, 2025. (Staff)
 - b. Require Xcel to include an assessment of whether undergrounding would reduce the identified disparities. *(OAG, if approved)*
35. Require Xcel to file revised and specific cost estimates tailored to Xcel’s service territory of the cost per mile for targeted undergrounding in areas disparately impacted by long duration outages. *(OAG)*
 - a. Require Xcel to file the updated estimates with its IDP due November 1, 2025. (Staff)
36. Deny Xcel Energy’s proposal to develop a targeted undergrounding plan for portions of North Minneapolis, South Minneapolis, and the area surrounding downtown St. Paul. *(DOC)*
37. Require Xcel to perform additional analysis as outlined in Decision Options 54 prior to developing a proposal for targeted undergrounding or enhanced vegetation management. *(Staff interpretation of DOC, [Xcel](#))*

Operational Changes

38. Require Xcel to propose potential operational changes in its outage-response efforts that would ensure more equitable distribution of repair efforts with its IDP due November 1, 2025. *(OAG)*
39. Require Xcel Energy to establish a rapid response team that will service outages in communities that are disparately impacted by long duration outages. *(Fresh Energy)*

ISQ Map

40. Require Xcel Energy to update its Interactive Service Quality Map to include two additional years of data. *(DOC)*

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41. Require Xcel Energy to add the following data to its Interactive Service Quality Map by Census Block Group by April 1, 2025. (*Xcel, Edina, Fresh Energy, GEC*)
 - a. Municipal Boundaries
 - b. Premise counts by census block group
 - c. Percentage of underground electric assets.
 - d. Percent of electric premises disconnected for 24 hours or more.
 - e. Average age of arrears for disconnected premises.
 - f. Per premise energy costs.

42. Require Xcel Energy to add to its Interactive Service Quality Map the average age of homes by Census Block Group by April 1, 2025. (*Xcel*)

OR
43. Require Xcel Energy to add to its Interactive Service Quality Map the average age of infrastructure in years by Census Block Group by April 1, 2025. (*Fresh Energy, GEC*)

44. Require Xcel Energy to add to its Interactive Service Quality Map total dollars past due of premises and total dollars past due of disconnected premises by April 1, 2025. (*GEC*)

OR
45. Require Xcel Energy to add to its Interactive Service Quality Map the average amount of arrears for disconnected premises by April 1, 2025. (*Xcel*)

46. Require Xcel Energy to add the following data to its Interactive Service Quality Map by Census Block Group by April 1, 2025.
 - a. Capital investment and O&M (dollars). (*Fresh Energy, GEC*)
 - b. Average outage duration (minutes). (*Fresh Energy, GEC, Edina*)
 - c. Number of premises in each census group block group served by voltage of secondary distribution circuit and whether such circuits are (1) radial or networked, and (2) overhead or underground. (*GEC*)
 - d. Extreme heat indicators such as extreme heat days, daily average temperature in summer months, or average surface temperatures. (*Fresh Energy, Edina*)
 - e. Average hosting capacity available to premises. (*GEC*)
 - f. Number of premises (1) disconnected once, twice, or three or more times and (2) reconnected once, twice, or three or more times. (*GEC*)
 - g. Percent of electric premises receiving a disconnection notice. (*GEC*)
 - h. Total dollars received from LIHEAP. (*GEC*)
 - i. Number of disconnected premises that were enrolled in Energy Assistance Programs. (*GEC*)

Future Analyses, Reporting, and Processes

47. Require Xcel Energy to monitor and report on progress toward eliminating the racial disparities among customers who are involuntarily disconnected in future SRSQ reports. (*City of Minneapolis*)

48. Require Xcel Energy to monitor and report on disparities identified between income level and participation in low-income programs in future SRSQ reports. (*City of Minneapolis*)

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49. Require Xcel Energy to report on discrepancies between the number of customers that have applied for and been enrolled in its medical protection programs in future SRSQ reports. (~~CUB/ECC~~)
50. Require Xcel Energy to file a cost-benefit analysis of combining the annual affordability reports and the SRSQ report in its April 1, 2025 SRSQ report in future SRSQ reports. (DOC)
51. Delegate authority to the Executive Secretary to work with Xcel and stakeholders to develop a proposal for what affordability and associated service quality data is reported in SRSQ report and what data continues to be reported in other dockets. The goal of the process is to develop a comprehensive list of existing affordability data reporting requirements and to identify which, if any, pieces of information are missing and should be included in future SRSQ reports. (Staff, Xcel)

Future Analysis

52. Require Xcel Energy to conduct a study similar to the TCR Service Quality and Demographics Analysis on a three-year cycle with the next report due on April 1, 2027 with its SRSQ Report. (Staff interpretation of Xcel, Department)
 - a. Require Xcel to use five years of data for future analyses. (Department)
53. Require Xcel Energy to conduct a study similar to the TCR Service Quality and Demographics Analysis on an annual basis with the next report due on April 1, 2025 with its SRSQ Report. (Staff interpretation of GEC)
54. Require Xcel Energy to develop its data collected on causes of CELI-12 outages to inform which causes predominantly affect CBGs currently showing increased CELI-12. Require Xcel Energy to then analyze whether the primary causes emerging in CBGs with increased CELI-12 are caused by overhead assets. (Xcel)
 - a. Require Xcel to provide an analysis of distribution equipment vintages in the affected CELI-12 communities and analyze whether upgrading this equipment would be cost effective. (OAG, Department, Xcel)
55. Require Xcel Energy to hire an independent consultant to conduct qualitative interviews with residents in CBGs with higher disconnection rates to better understand perceived causes of disconnection, effective communications practices, and whether there are additional steps the Company could take to adjust its programs to help customers avoid disconnections. (Xcel)
56. Require Xcel Energy to hire an independent third-party evaluator with expertise in evaluating racial disparities to conduct a one-year study that will evaluate Xcel's practices and policies related to capital investment planning, outage restoration practices, and shutoff practices to better understand the causes of these discrepancies in shutoff rates and service reliability. Require Xcel Energy to engage interested stakeholders to participate and collaborate with the independent third-party evaluator. (Fresh Energy, Xcel)

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57. Delegate authority to the Executive Secretary to open a new docket focused on disparities identified in the TRC and Pradhan/Chan studies and Xcel Energy's efforts to reduce them. (*Staff interpretation of GEC and Fresh Energy, [Xcel](#)*)