

July 15, 2025

Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E002/M-25-27

Dear Executive Secretary:

On July 10, 2025, the Commission issued briefing paper *in the Matter of Northern States Power Co. d/b/a Xcel Energy's 2024 Annual Safety, Reliability, and Service Quality Report*, regarding remote reconnection of involuntarily disconnected customers and the suspension of disconnections during extreme heat events and air quality alerts.

Below, the Department presents its preferred decision options and a new decision option that combines reporting requirements at the level of granularity the Department concludes would be most usable to Commission staff and parties. The Department's position is best summarized in its reply comments.

A. Department Preferred Decision Options

The Department supports decision options: 1, 2, 3, New CUB 8B, 9, 10, 12, 13, 14, 15, 16, 17, 18, 19, 20, 22, 24, 25, and 26.

The Department opposes decision options: 4, 5, and 11.

B. Department New Decision Option

The Department proposes the following decision option as a combination of the reporting requirements requested in decision option 21 and decision option 23 of the Commission's briefing papers. After reviewing the decision options and the briefing papers at large, the Department concludes that there was significant overlap in the requested data of decision options 21 and 23. Commission Staff also discussed within the briefing papers that the Commission utilizes Census Block Group and zip code level data instead of the county level data requested by the parties. As such, the

Department combined the data requests, removed duplicative requests, and adjusted the data granularity to arrive at the following new decision option:

NEW Dept DO [#]: Require Xcel Energy to include in its annual 2025 and all future Safety, Reliability, and Service Quality (SRSQ) reports, both in aggregate and by county zip code and CBG, the following data:

- a. The number of extreme heat and air quality events
- b. Each event where disconnection suspensions or reconnection were triggered
- c. The date(s) and length of each event.
- d. The counties, zip codes and CBGs impacted by the event
- e. The number of customers eligible for extreme heat and air quality protections during each event.
- f. The number of customers whose disconnections are suspended or were reconnected during each event.

The Department also notes that the reference to decision option 21 in decision option 22 would also need to be updated to reflect the Department's new decision option, should the Commission wish for the data identified above to be incorporated into the Company's service quality map to the extent feasible.

The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ Dr. SYDNIE LIEB

Assistant Commissioner of Regulatory Analysis

RW/ad

CERTIFICATE OF SERVICE

I, Nicole Westling, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce
Letter**

Docket No. E002/M-25-27

Dated this **15th** day of **July 2025**

/s/Nicole Westling

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