

July 11, 2025

PUBLIC DOCUMENT

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

RE: **PUBLIC** Comments of the Minnesota Department of Commerce
Docket No. E002/M-25-27

Dear Mr. Bull:

Attached are the **PUBLIC** comments of the Minnesota Department of Commerce (Department) in the following matter:

Xcel Energy's 2024 Annual Safety, Reliability, and Service Quality Standards Report and Proposed SAIFI, SAIDI, and CAIDI Reliability Standards for 2024.

The Petition was filed by Xcel Energy (Xcel or the Company) on April 1, 2025.

Traditionally, the Department provides its recommendations for the Annual Safety and Service Quality Reports in its Comments. The recommendation regarding the Annual Service Reliability Report is then addressed in a letter or supplemental comments once the utilities have reported the IEEE annual benchmarks which usually occurs in late August. The Department's comments in this docket differ from those in past years in that the Department is requesting further information from Xcel which the Department assumes the Company will provide in its reply comments.

The Department apologizes for its need to request that Xcel provide this information in its reply comments. Under normal circumstances, the Department would issue information requests earlier in the process and then provide the Commission with its analysis based on that information in its comments.

The Department anticipates filing supplemental comments with recommendations for the Safety and Service Quality Annual Reports separately and sooner than the supplemental comments/letter it normally files regarding its recommendations on the Company's 2024 Reliability Report and its 2025 reliability goals.

One reason for this situation is the significant increase in reporting requirements and detail that the Commission included in its *Order Accepting Reports and Setting Additional Requirements* dated January

July 15, 2025

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13, 2025 in Docket No. E002/M-24-27. The extent and detail of the information required because of the reporting requirements in that Order required Xcel to add an entire section to its SRSQ filing titled: Part III: January 13, 2025 Order Compliance.

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

Sincerely,

/s/ Dr. SYDNIE LIEB
Assistant Commissioner of Regulatory Analysis

JK/RW/ar
Attachment

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Acronyms and Abbreviations

AMI	Advanced Metering Infrastructure
AMR	Automated Meter Reading
ANSI	American National Standards Institute
ASA	Average Speed of Answer
BSC	Business Solutions Center
CAIDI	Customer Average Interruption Duration Index
CAO	Consumer Affairs Office (of the Public Utilities Commission)
CELI	Customers Experiencing Lengthy Interruptions
CBG	Census Block Group
CEMI	Customers Experiencing Multiple Interruptions
CMI	Customer Minutes of Interruption
CPI	Consumer Price Index prepared by the United States Bureau of Labor Statistics
CUB	Citizens Utility Board
CWR	Cold Weather Rule
DLI	Minnesota Department of Labor and Industry
DER	Distributed Energy Resources
DOC	Minnesota Department of Commerce, Division of Energy Resources
DSM	Demand-Side Management
EEC	Energy Cents Coalition
EEI	Edison Electric Institute
EIA	U. S. Energy Information Administration
ERT	Estimated Restoration Time
FLISR	Fault Location Isolation and Service Restoration
GIS	Geographic Information System
Grid Mod	Grid Modernization
IDP	Integrated Distribution Plan
IEEE	Institute of Electric and Electronics Engineers
IR	Information Request
IVR	Interactive Voice Response
kW	Kilowatt
kWh	Kilowatt-Hour
LIHEAP	Lower-income home energy assistance program
MAIFI	Momentary Average Interruption Frequency Index
MAP	Medical Affordability Program
NWS	United States National Weather Service
OMS	Outage Management System
OSHA	United States Occupational Safety and Health Administration
OSHD	Occupational Safety and Health Division of Minnesota Department of Labor and Industry
PAR	Personal Account Representative
PBR	Performance Based Ratemaking
PUC	Public Utilities Commission
QSP	Quality of Service Program
RCD	Remote Customer Disconnection

Acronyms, Abbreviations and Definitions

SAIDI	System Average Interruption Duration Index
SAIFI	System Average Interruption Frequency Index
Staff	Minnesota Public Utilities Commission Staff
SRSQ	Safety, Reliability, and Service Quality
Xcel	Xcel Energy

Definitions

2013 SRSQ Order	Minnesota PUC Order accepting Xcel’s 2013 calendar year SRSQ results and setting reliability goals for 2014 (Docket No. E002/M-14-131)
2019 SRSQ Order	Minnesota PUC Order accepting Xcel’s 2019 calendar year SRSQ results and setting reliability goals for 2020 (Docket No. E002/M-20-406)
2020 SRSQ Order	Minnesota PUC Order accepting Xcel’s 2020 calendar year SRSQ results and setting reliability goals for 2021 (Docket No. E002/M-21-237)
2021 SRSQ Order	Minnesota PUC Order accepting Xcel’s 2021 calendar year SRSQ results and setting reliability goals for 2022 (Docket No. E002/M-22-162)
2022 SRSQ Order	Minnesota PUC Order accepting Xcel’s 2022 calendar year SRSQ results and setting reliability goals for 2023 (Docket No. E002/M-23-73)
2023 SRSQ Order	Minnesota PUC Order accepting Xcel’s 2023 calendar year SRSQ results and setting reliability goals for 2024 (Docket No. E002/M-24-27)
Bulk Power Supply Facility*	The interconnected system that encompasses the electric generation resource, transmission lines, transmission substations, and associated equipment that, upon a total, simultaneous, and sustained interruption, disrupts service to all distribution feeders exiting that substation when those distribution feeders do not have service restoration interconnections with alternate sources.
Filing	Information provided in response to reporting requirements in Minn. R. 7829.1300.
Major Service Interruption*	An interruption of service at the feeder level or above and affecting 500 or more customers for one or more hours.
MED	Major Event Day - Days when an electric utility (in this instance Xcel) experiences a storm or other event which generates a daily SAIDI or SAIFI result that is greater than the IEEE threshold. Those days are removed from the data used to normalize the annual metrics.
Metro-Area Work Centers	Xcel’s Metro East and Metro West work centers
Non-Metro Work Centers	Xcel’s Northwest and Southeast work centers
Petition	For this document, the Petition Includes: the Filing, Safety Report, Service Quality and Safety Reports.
Range – Mathematical	The range of a data set is the difference between the greatest value and lowest value within a collection of numbers.
Reliability Report	Calendar year 2024 information related to Reliability-related reporting requirements identified in Minn. R. 7826. Those reporting requirements include reliability reporting requirements, reliability standards and reporting major service interruptions.
Safety Report	Calendar year 2024 information related to Safety-related reporting requirements identified in Minn. R. 7826. Those reporting requirements include safety standards and the annual safety report.

Acronyms, Abbreviations and Definitions

Service Quality Report	Calendar year 2024 information related to Service Quality-related reporting requirements identified in Minn. R. 7826. Those reporting requirements include meter-reading performance, reporting on involuntary disconnections, service extension request response times, emergency medical account status, customer deposits and customer complaints.
Annual Report or SRSQ Report	Calendar year 2024 information related to Commission reporting requirements encompassing the topics identified in Minn. R. 7826. Those topics include safety, reliability and customer service.
Work Center*	A portion of an electric utility's assigned service area that it treats as an administrative subdivision for purposes of maintaining and repairing its distribution system.

* Selected definitions taken from Minnesota Rule 7826. 0200, Definitions.

Before the Minnesota Public Utilities Commission

PUBLIC Comments of the Minnesota Department of Commerce

Docket No. E002/M-25-27

I. INTRODUCTION

On April 1, 2025, Northern States Power Company d/b/a Xcel Energy (Xcel or the Company) filed its 2024 Annual Safety, Reliability and Service Quality Standards Report (2024 SRSQ Report or Annual Report) in Docket No. E002/M-25-27 in compliance with the Public Utilities Commission (Commission) orders and the requirements of Minnesota Rules Chapter 7826. Minnesota’s electric utilities have been filing these annual reports since at least 2009. The information in the Annual SRSQ Report provides an overview of the utility’s operational performance for the previous year. It is also the filing in which the Commission determines an electric utility’s reliability goals for the following year.

II. PROCEDURAL BACKGROUND

April 1, 2025	Xcel filed its 2024 SRSQ Report.
April 7, 2025	Xcel filed an erratum that included updated Tables 28 and 29.
April 7, 2025	The Commission filed a notice of comment period on Phase 1 of Xcel’s Safety, Reliability, and Service Quality Report Proceedings.
April 30, 2025	The Commission issued a notice of comment period for the petition.
May 9, 2025	The Department, the Office of the Attorney General Residential Utilities Division (OAG-RUD), and the Citizens Utility Board, Legal Services Aid Project and Energy Cents Coalition (CUB, LSAP, and ECC) filed comments on Phase 1 of Xcel’s Safety, Reliability, and Service Quality Report Proceedings.
May 14, 2025	Xcel filed a letter that included a presentation on AMI Remote Disconnect/Reconnect Evaluation Metrics that was discussed at a workshop Xcel sponsored.
May 30, 2025	The Minnesota Department of Health filed comments in this proceeding in response to the notice regarding Phase 1 of Xcel’s Safety, Reliability, and Service Quality Report Proceedings.
June 3, 2025	The Department, OAG-RUD, CUB/LSAP/ECC and Xcel filed reply comments.

Analysts assigned: John Kundert, Rachel Wiedewitsch

Topics open for comment relevant to Xcel's Petition:

- Should the Commission accept the Electric Utilities' 2024 Annual Safety, Reliability, and Service Quality (SRSQ) Reports?
- Should the Commission approve Xcel Energy's request for a variance to Minn. Rule 7820.2500 to perform remote disconnections without a site visit?
- Are there other issues or concerns related to this matter?

The Minnesota Department of Commerce, Division of Energy Resources (Department) submits the following comments, pursuant to the Commission's notice.¹

III. SUMMARY OF REPORT AND DEPARTMENT ANALYSIS

The Department reviewed Xcel's Annual Report to assess compliance with Minnesota Rules, Chapter 7826² and the Commission's various Orders. The Department used information from past annual reports to facilitate identification of issues and trends regarding Xcel's performance.

The Department:

- Responds to the questions in the Commission's notice;
- Reviews and analyzes Xcel's Safety and Reliability Reports;
- Discusses the Company's reliability standards for 2025;
- Reviews and analyzes Xcel's Service Quality Report; and
- Discusses the Company's efforts to comply with the relevant reporting requirements included in the Commission's 2023 SRSQ.

The Department also summarizes its recommendations.

A. RESPONSE TO THE COMMISSION'S NOTICE

A.1. *Should the Commission accept Xcel's 2024 Annual Safety, Reliability, and Service Quality (SRSQ) Reports?*

The Department defers on forwarding an overall recommendation on Xcel's 2024 Annual SRSQ Report. The Department is requesting additional information in reply comments from the Company regarding information included in its all three of components of the Annual SRSQ Report (safety, service reliability and service quality). The Department will provide recommendations on the Company's 2024 Safety and Service Quality Reports after reviewing Xcel's reply comments.

¹ Commission's Notice of Comment Period, April 30, 2025, (eDockets) [20254-218387-01](#) (hereinafter "Commission's notice").

² [Minn. R. 7826](#).

Regarding the Reliability Report, Xcel will supplement its petition with the results of IEEE's 2024 benchmarking results.³ The supplement will likely be filed in the fall of 2025. The Department will file supplemental comments or a letter summarizing its review of that information after it is received and will provide a recommendation on the Reliability Report at that time. The Department will also forward a recommendation on the Company's 2025 Reliability Goals in that document.

A.2. Should the Commission approve Xcel Energy's request for a variance to Minn. Rule 7820.2500 to perform remote disconnections without a site visit?

The Department's analysis of the Company's request for a variance to Minn. R. 7820,2500 considers: 1) the extensive customer protections the Commission has required regarding Xcel's remote disconnection policy, 2) employee safety, 3) operational considerations and 4) cost impacts.

The Department identified ten order points in the Commission's 2023 SRSQ Order that it would classify as being customer safeguards directly related to Xcel's disconnection policy.⁴ The Commission also included three order points focused on improving the reach of different existing customer assistance programs.⁵ The Commission also required the Company to research new programs or propose a new cost-recovery mechanism that would benefit low-income customer assistance programs in its current rate case three additional order points.⁶

The Commission has increased the level of customer protections associated with the involuntary customer disconnections significantly and Xcel has largely complied.

Xcel has noted in past filings on this topic that remote disconnection is preferable to physical disconnection if one considers the additional personal risk an Xcel field agency experiences when physically disconnecting or reconnecting a customer.⁷ Remote disconnection/reconnections appear to be safer than physical disconnection/reconnection for Xcel's employees.

Turning to the operational perspective, the Department reviewed the reconnection time metrics for 2024 Xcel provided in its Petition.⁸ The average time it took to reconnect a customer from either customer class was 99% lower than performing a manual reconnection. The longest time it took to reconnect a customer remotely was 67% lower than longest time it took to reconnect a residential customer manually. The shortest time it took to reconnect a customer remotely was 100% lower than shortest time it took to reconnect a residential customer manually. These results suggest the time it

³ Petition at 48.

⁴ *In the Matter of Xcel Energy's 2024 Safety, Reliability and Service Quality Standards Report*, PUC Order, January 13, 2025, Docket No. E002/M-24-27 at Order Points 19, 22, 23, 24, 26, 27, 28, 29, 30, and 34 (eDockets) [20251-213880-01](#) (hereinafter "2023 SRSQ Order").

⁵ *Ibid.* at Order Points 20, 21 and 25.

⁶ *Ibid.* at Order Points 31, 32 and 33.

⁷ *In the Matter of a Petition by Northern States Power Requesting Approval of Changes to its Tariff and Indefinite Variance to Commission Rules Regarding Disconnection of Service*, Order, March 22, 2023 at Order Point 5 (eDockets) [20223-194154-01](#) (hereinafter "Remote Reconnection Variance Order").

⁸ Petition at 23-24, Table 9.

takes disconnect and reconnect a customer remotely are much shorter than performing the same action manually. All other things equal, that development would allow the Company's employees to "do more with less".

Considering costs, Xcel provided a table that compared remote and physical disconnect/reconnect costs for 2024 in the filing.⁹ In 2024 the average cost of a remote disconnect/reconnect was only 13% of the average cost of a physical disconnect/reconnect.¹⁰ It appears that it was much more efficient economically to reconnect a customer remotely than it was to reconnect that same customer physically in 2024. For 2022 and 2023, the average costs of a remote disconnect/reconnect percentages were 12 percent and 14 percent of the average costs of a physical disconnect/reconnect, respectively. These results suggest the cost differential between a remote disconnect/reconnect and a physical disconnect/reconnect has remained constant over that time.¹¹

Given the: 1) extensive customer safeguards the Commission has required to protect customers facing involuntary disconnection in response to the Company's request for a remote reconnection variance; 2) improvement in employee safety resulting from the approval of the variance; 3) the operational benefits of remote disconnect/reconnects and 4) the lower cost of remote disconnect/reconnects compared to physical disconnects, the Department recommends that the Commission approve the Company's request to continue its remote disconnect/reconnect policy for another year.

Procedurally, Commission approval of Xcel's remote disconnect/reconnect policy will require a variance to Minn. Rule 7820.2500 to perform remote disconnections without a site visit.¹² The Department discusses the Rule and the basis for its determination that the request meets the requirements for a variance identified in Minn. Rule 7829.3200 in the section titled "Request for Variance to Minn. R. 7825.2500 Regarding AMI Reconnection".

A.3. Are there other issues or concerns related to this matter?

The Department has not identified any other issues or concerns related to this matter.

B. ANNUAL SAFETY REPORT

The annual safety report consists of two parts in accordance with Minn. R. 7826.0400:¹³

- A. Summaries of all reports filed with the United States Occupational Safety and Health Administration (OSHA) and the Occupational Safety and Health Division of the Minnesota Department of Labor and Industry (OSHD) during the calendar year; and

⁹ Petition at 25 Table 10.

¹⁰ 2024 Average Cost of Remote Reconnection (\$19.96)/ 2024 Average Cost of Physical Reconnection (\$158.31) = 13%.

¹¹ Calculation discussed earlier in comments.

¹² Petition at 3.

¹³ [Minn. R. 7826.0400](#)

Analysts assigned: John Kundert, Rachel Wiedewitsch

- B. A description of all incidents during the calendar year in which an injury requiring medical attention of property damage resulting in compensation occurred because of any injuries or property damage described.

B.1. Annual Summary of Safety Information Reported

Table 1 summaries of Xcel’s annual information filed with OSHA and OSHD for the last ten years.

Table 1: Case Data from Reports filed with OSHA and OSHD (2014 – 2024)¹⁴

Year	Deaths	Cases - Days Away From Work	Cases - Job Transfer/Restriction	Other Recordable Cases	Days of Job Transfer/Restriction	Days Away from Work
2014	0	4	1	24	217	123
2015	0	3	0	9	45	222
2016	0	3	3	7	95	310
2017	0	2	2	6	90	31
2018	0	3	2	4	97	95
2019	0	6	2	11	251	123
2020	0	8	4	9	605	286
2021	0	24	10	14	533	620
2022	0	30	1	4	223	369
2023	0	3	11	11	43	400
10-Yr Avg.	0	8.6	3.6	9.9	219.9	257.9
2024	0	10	7	3	273	336
2024 - Range	N/A	18.0	4.0	17.0	289.0	253.0

**Source: Minnesota Department of Commerce*

There was an increase in the “Number of cases with days away from work” and “Days of job transfer/restriction” in 2024 compared to 2023 and an increase of the number of “Cases with job transfer/restriction.” The 2024 results for the categories “Other recordable cases,” and “Days away from work” declined compared to the 2023 results and the number of “Deaths” remained constant at zero. The 2024 results for “Cases with days away from work,” “Cases with job transfer/restriction,” “Days of job transfer/restriction,” and “Days away from work” were all above their respective ten-year averages. For 2024, only “Other recordable cases” was below the ten-year average.

Initially, the 2024 results for the number of “Days of job transfer/restriction” and “Days away from work” when compared to the ten-year averages concerned the Department. The Department included the ten-year range and ten-year average range in its chart above to determine if the categories were

¹⁴ Petition at Attachment A.

unusually high in Xcel’s current report.¹⁵ The results were not outliers when compared to the ten-year metrics for the same categories. Thus, the Department concludes the 2024 results are not unreasonable for the “Days of job transfer/restriction” and “Days away from work” categories. The Department concludes Xcel has complied with this reporting requirement.

B.2. Summary of Property Claims Damages

The following table summarizes Xcel’s most recent and past reports’ information regarding property damage claims that occurred because of downed wires or other electrical system failures.

TRADE SECRET Table 2: Property Damage Claims (2014 – 2024)¹⁶

Year	Claims	Total Amount Paid	Average Claim (\$)
2014	92	\$ 137,610	\$1,496
2015	90	\$ 185,584	\$2,062
2016	47	\$ 111,290	\$2,368
2017	50	\$ 135,844	\$2,717
2018	79	\$ 147,754	\$1,870
2019	81	\$ 1,203,379	\$14,857
2020	66	\$ 274,049	\$4,152
2021	65	\$ 178,419	\$2,745
2022	77	\$ 397,768	\$5,166
2023	79	\$ 177,895	\$2,252
10 Yr. Avg	72.6	\$ 294,959	\$4,063
10-Yr Range	45	\$ 1,092,089	\$13,361
2024	81	[TRADE SECRET DATA HAS BEEN EXCISED]	
Max Range - 2024	No		

**Source: Minnesota Department of Commerce*

The amount Xcel paid out in property damage claims increased significantly in 2024 compared to 2023 and was also significantly higher than the ten-year average. The number of claims in 2024 was not unusually high, but the average amount per claim increased significantly. Like the OSHA and OSHD

¹⁵ Mathematical Range provides an indication of the variability of a data set. A wide range signifies substantial variation. A narrow range shows lower variability in a distribution. See [Mathematical Range](#).

¹⁶ Petition at **TRADE SECRET** Attachment B 2 for 2024 information.

information, the Department included the ten-year range for those metrics to determine if the 2024 results could be considered outliers. All three of the metrics were outside the ten-year range.

Xcel did reference several large claims that were filed before 2024 but were resolved in 2024 as the reason for these higher 2024 values. The Department notes that the historical data would also reflect that sort of effect if it had historical precedent, so the Company's position does not appear to be complete. The Department also notes that the two highest annual values for claims have both occurred in the past five years. The Department requests that Xcel, in reply comments, provide additional information on its efforts to minimize damages from claims.

The Department will provide a recommendation on Xcel's annual safety report in supplemental comments after reviewing the Company's reply comments.

C. ANNUAL RELIABILITY REPORT – RULES BASED REPORTING REQUIREMENTS

Minnesota Rules 7826.0500 through 7826.0700 delineate:¹⁷

- Reliability reporting requirements;
- Reliability standards; and
- Reporting requirements for major service interruptions.

The Department provides a summary of the reliability reporting requirements from Minnesota Rules and as modified by recent Commission Orders.

C.1. Reliability Performance

Minn. R. 7826.0500 subp. 1 states:

Subpart 1. Annual reporting requirements. On or before April 1 of each year, each utility shall file a report on its reliability performance during the last calendar year. This report shall include at least the following information:

- A. the utility's SAIDI for the calendar year, by work center and for its assigned service area as a whole;
- B. the utility's SAIFI for the calendar year, by work center and for its assigned service area as a whole;
- C. the utility's CAIDI for the calendar year, by work center and for its assigned service area as a whole;¹⁸

In accordance with Minn. R. 7826.0500 subp. 1A-C, Xcel reports the utility's SAIDI, SAIFI, and CAIDI by work center and system-wide for each calendar year.

¹⁷ [Minn. R. 7826.500](#); [Minn. R. 7826.600](#); and [Minn. R. 7826.700](#)

¹⁸ [Minn. R. 7826.0500 subp. 1A-C](#)

The Commission established a benchmarking approach for setting reliability standards for investor-owned utilities.¹⁹ This benchmarking approach was first adopted for Xcel's system reliability standards in Docket No. E002/M-20-406. The System reliability benchmark was set for 2022 at the IEEE benchmarking second quartile for large utilities. The Commission established the IEEE reporting standard for Xcel at the work center level for 2021 the following year in Docket No. E002/M-21-237.²⁰

The Company's 2024 reliability standards for its Southeast and Northwest work centers were set at the IEEE benchmarking second quartile for medium utilities. The same reliability metric for Xcel's System, Metro West and Metro East work centers were set at the IEEE benchmarking second quartile for large utilities.²¹

IEEE does not publish its benchmarking results for the prior year until the third quarter of the following year, so Xcel does not yet know how the utility's 2024 performance metrics compare to the 2024 benchmarks. Xcel will make a supplemental filing within 30 days of when IEEE Benchmark Year 2025 results for 2024 Data are published.²²

The Department will provide a recommendation on the Company's Reliability Report after reviewing Xcel's Supplemental Filing on the Institute of Electrical and Electronic Engineers (IEEE) 2024 benchmarking data that the Company will file later in 2025.

Since 2024 IEEE Benchmark Reliability Survey results will not be available until later this year, the Department reviewed 2024 performance against the 2023 IEEE benchmarks to serve as a useful proxy. Table 3 provides a comparison of the Company's 2023 IEEE reliability performance compared with the 2023 goals set for Xcel's system at IEEE second quartile benchmarks for large utilities for its System, Metro East and Metro West work centers and for the Company's Northwest and Southeast work centers at IEEE second quartile benchmarks for medium utilities.

This comparison provides a point of reference for Xcel's actual 2024 reliability performance compared to the most-recent available goals.

When comparing Xcel's 2024 performance against 2023 benchmark, Xcel meets nine out of fifteen benchmarks. The Company's 2024 SAIDI results for its Metro East, Northwest and Southeast work centers exceeded the 2023 benchmark. Xcel did not meet the 2023 SAIFI benchmark at the System level and its Metro-Area Work Centers.

¹⁹ *In the Matter of Xcel Energy's 2019 Safety, Reliability and Service Quality Standards Report*, PUC Order, December 19, 2020, Docket No. E002/M-20-406. PUC Order, at Order Point 11 (eDockets) No. [202012-169158-03](#) (hereinafter "2019 SRSQ Order")

²⁰ *In the Matter of Xcel Energy's 2020 Safety, Reliability and Service Quality Standards Report*, PUC Order, March 2, 2022, Docket No. E002/M-21-237 (eDockets) [20223-183363-02](#) at Order Point 8. (hereinafter "2020 SRSQ Order").

²¹ 2023 SRSQ Order at Order Point 6.

²² Petition at 33.

Table 3: Xcel’s 2024 Reliability Performance vs. 2023 IEEE Benchmark^{23, 24}

Description	Metric	2023 IEEE Benchmark	2024 Xcel Performance	Met 2023 Benchmark?
System	SAIDI	114	110.04	Yes
	SAIFI	0.96	1.08	No
	CAIDI	126	101.95	Yes
Metro East	SAIDI	114	115.5	No
	SAIFI	0.96	1.08	No
	CAIDI	126	107.15	Yes
Metro West	SAIDI	114	101.37	Yes
	SAIFI	0.96	1.14	No
	CAIDI	126	88.58	Yes
Northwest	SAIDI	121	122.44	No
	SAIFI	1	0.92	Yes
	CAIDI	139	132.86	Yes
Southeast	SAIDI	121	121.49	No
	SAIFI	1.00	0.92	Yes
	CAIDI	139	131.52	Yes

Source: Minnesota Department of Commerce

Xcel identified weather as the largest reliability factor contributing to outages in 2024. The Company identified “Vegetation Tree,” “Lightning,” and “Debris in Line” as the top three causes for outages.²⁵

The Commission’s Orders in Xcel’s annual SRSQ dockets for 2020, 2021, 2022, and 2023 all maintained the Company’s annual reliability metrics at the second quartile level for large utilities for its Minnesota Service territory, Metro East and Metro West work centers. Xcel’s annual reliability goals for its Northwest and Southeast work centers also remained identical to those set in the 2019 SRSQ Order, second quartile for medium utilities.²⁶

²³ *In the Matter of Xcel Energy’s 2024 Safety, Reliability and Service Quality Standards Report*, Filing, September 26, 2024, Docket No. E002/M-24-27 (eDockets) [20249-210518-01](#) at 2.

²⁴ Petition at 33.

²⁵ Petition at 37 .

²⁶ 2020 SRSQ Order at Order Point 8. *In the Matter of Xcel Energy’s 2021 Safety, Reliability and Service Quality Standards Report*, PUC Order, November 9, 2022, Docket No. E002/M-22-162 at Order Point 4 (eDockets) [20211-190522-03](#) (hereinafter “2021 SRSQ Order”). *In the Matter of Xcel Energy’s 2022 Safety, Reliability and Service Quality Standards Report*, PUC Order, December 5, 2022, Docket No. E002/M-23-73 at Order Points 4, 6 and 7, (eDockets) [202312-200980-03](#) (hereinafter “2022 SRSQ Order”).

The Department provides Figures 1 – 9 below, showing Xcel’s SAIFI, SAIDI, and CAIDI normalized performance rates and goals for the system overall and by work center.²⁷

Figure 1: SAIDI for Overall System (2020 – 2024)

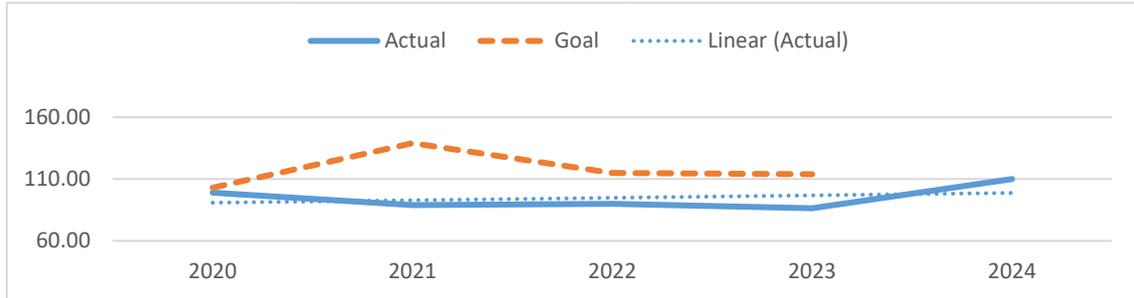
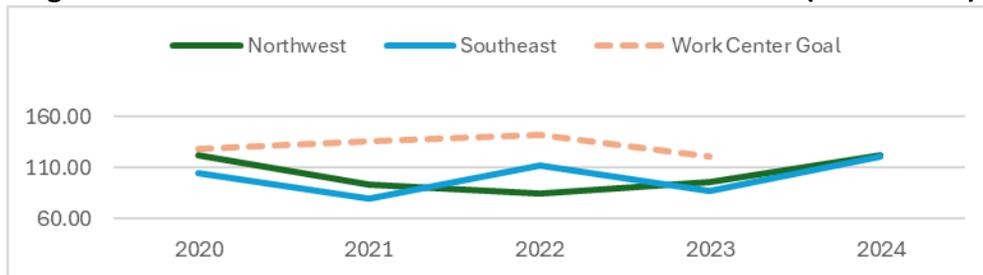


Figure 2: SAIDI for Metro East and Metro West Work Centers (2020 – 2024)



Figure 3: SAIDI for Northwest and Southeast Work Centers (2020 - 2024)



At the system level, Xcel’s SAIDI values have been trending slightly higher over past five years. The Non-Metro Work Center’s actuals decreased (improved) from 2020 through 2023. At the work center level, Metro East’s actuals increased from 2021 through 2023, while the Metro West’s actuals declined in 2022 and 2023, after increasing slightly in 2021.

²⁷ Petition at Table 13, at 33. Historic data retrieved from prior Xcel filings. Note that the 2020 work center reliability goals were set in the 2019 SRSQ Order using a utility-specific historical methodology rather than the IEEE standards.

Figure 4: SAIFI for Overall System (2020 – 2024)

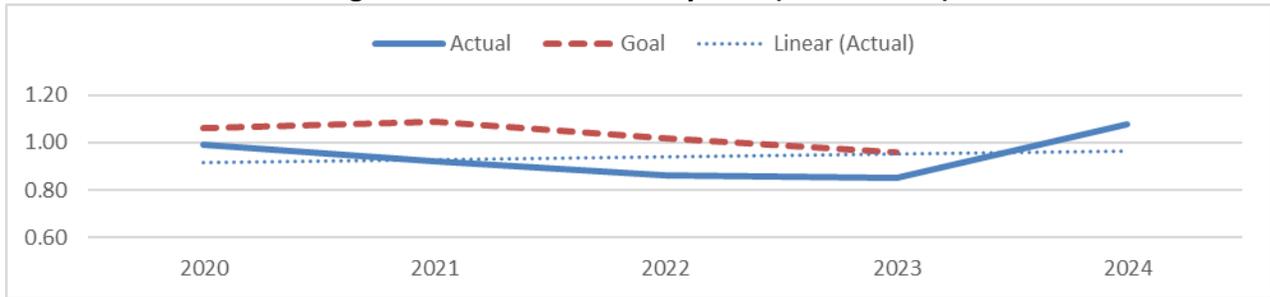


Figure 5: SAIFI for Metro East and Metro West Work Centers (2020 - 2024)



Figure 6: SAIFI for Northwest and Southeast Work Centers (2020 - 2024)



The Company’s SAIFI performance on a system basis has also been trending slightly positive over the five years like SAIDI. On a work center level, performance varied.

Figure 7: CAIDI for Overall System (2020 – 2024)

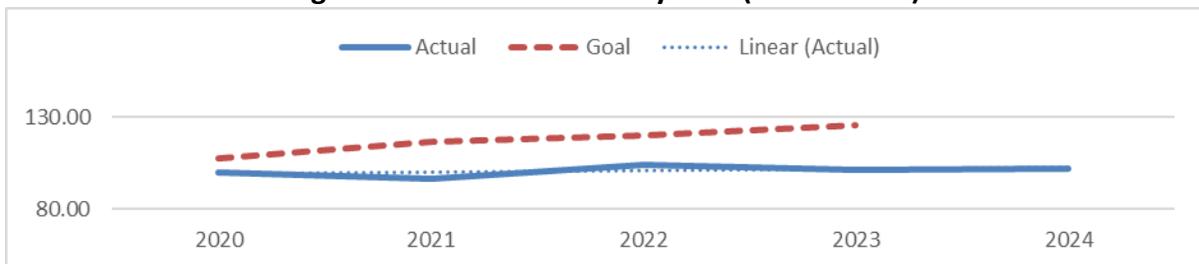
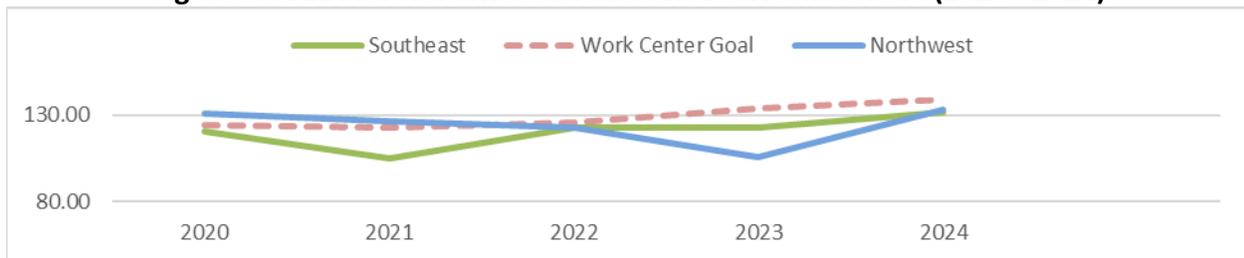


Figure 8: CAIDI for Metro East and Metro West Work Centers (2020 – 2024)



Figure 9: CAIDI for Northwest and Southeast Work Centers (2020 - 2024)



Over the last five years, Xcel’s CAIDI performance has been increasing slightly, but well-below (better than) the IEEE benchmarks for the overall system. The Company’s 2024 CAIDI system performance was stable compared to prior years. On a work center level, performance varied. The Metro East and Metro West work center’s results were flat. The Southwest work Center’s results started worsening (increasing) in 2022 and the Northwest work center’s results improved (decreasing) through 2023, but then increased in 2024.

Based on its review of Xcel Energy’s 2024 system-wide reliability requirements reporting, the Department concludes the Company has fulfilled the following reporting requirements for SAIDI, SAIFI and CAIDI by calendar year for service area.²⁸

C.2. Normalization

Minn. R. 7826.0500 subp. 1D requires the utility to provide:

- D. an explanation of how the utility normalizes its reliability data to account for major storms;²⁹

Xcel uses the IEEE 1366 normalization method for storm normalization, which excludes data due to major events such as large storms. To determine which singular events should be excluded from the reliability metrics data, Xcel compares the SAIDI for individual events to the IEEE’s Major Event Threshold. In cases where a storm or other event Xcel experienced has a greater SAIDI than the

²⁸ [Minn. R. 7826.0500 subp. 1A-C.](#)

²⁹ [Minn. R. 7826.0500 subp. 1D.](#)

Analysts assigned: John Kundert, Rachel Wiedewitsch

threshold, the data collected during those events are removed and this time-period is called a Major Event or Major Event Day (MED) and removed from the normalization calculation.³⁰

The Company calculates MEDs by work center. In 2024 the Metro East and Metro West work centers had 5 and 6 MEDs respectively. The Northwest and Southeast work centers had 3 and 1 MEDs.³¹ The total number of MEDs by work center in 2024 was 15.

Table 4 provides the number of MEDs by year for Xcel's system and work center since 2019.

Xcel had average of 10.0 major events from 2019–2023, with a high of fourteen events in 2022.³² The Department interprets those results as signifying that 2024 was a year with a larger number than average of storms and other weather-events.

Table 4: Number of MEDs by Work Center 2019-2024³³

Year	Minnesota	Metro East	Metro West	Northwest	Southeast
2019	11	2	2	3	4
2020	7	1	4	1	1
2021	8	2	2	1	3
2022	14	4	4	5	1
2023	10.00	4.00	4.00	1.00	1.00
5 Yr. Avg.	10.00	2.60	3.20	2.20	2.00
2024	15.00	5.00	6.00	3.00	1.00

The Department acknowledges Xcel fulfilled the reporting requirement that a utility provide an explanation of how it normalizes its reliability data to account for major storms.

C.3. Action Plan to Improve Reliability

Minn. R. 7826.0500 subp. 1.E states that the Company must provide:

E. an action plan for remedying any failure to comply with the reliability standards set forth in part 7826.0600 or an explanation as to why noncompliance was unavoidable under the circumstances;³⁴

³⁰ Petition at 33 and 34.

³¹ Petition at 48.

³² *Ibid.*

³³ Petition at 48. Table 15 lists MED by work center for 2024. The Department collected the same information from previous filings to create Table 4.

³⁴ [Minn. R. 7826.0500 subp. 1.E.](#)

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Xcel stated that many the outages in 2024 were attributed to a high level of precipitation during June and then thunderstorms in July. This unusual weather led to many vegetation/weather events which damaged the distribution and transmission systems and were not lightning-related. These vegetation/weather events, in turn, led to overhead and underground equipment failures.³⁵ The Company provides updates on its efforts to address these challenges and enhance its reliability performance in Attachment J of the Petition.

Xcel provides a detailed reliability analysis for each of its four work centers, including the following:

- Actual annual reliability factors by work center for the past five years (2020 through 2024).
- The current year difference for SAIFI and SAIDI for every outage code compared to the five-year average.
- A table listing the MEDs, as well as days which had moderate storm activity, and specific outages for transmission, distribution substations, and distribution lines.

The Department acknowledges Xcel fulfilled the requirements of Minn. R. 7826.0500, subp. 1.E.

C.4. Bulk Power Supply Interruptions

Minn. R. 7826.0500 subp. 1.F. requires the utility:

F. to the extent feasible, a report on each interruption of a bulk power supply facility during the calendar year, including the reasons for interruption, duration of interruption, and any remedial steps that have been taken or will be taken to prevent future interruption;

Xcel reported no generation outages on the Company's system that caused an interruption of service to firm electric customers in 2024.³⁶ The Company provided a table listing 19 non-generation related interruptions in 2024. The shortest outage was 3 minutes while the longest was 3 hours and forty-six minutes.³⁷ The duration of the maximum outage in 2024 was the shortest of any annual maximum duration outage since 2019. The duration of the minimum outage in 2024 was like annual results since 2019. The number of bulk power supply interruptions in 2024 was 14 percent lower than in 2023 and 52 percent lower than the five-year average. The maximum and minimum durations of those 19 interruptions in 2024 were consistent with prior years.

The Department acknowledges Xcel's fulfillment of the requirements of Minn. R.7826.0500, subp. 1.F.

³⁵ Petition at 49, 53, 57 and 62.

³⁶ Petition at 63.

³⁷ Petition at Attachment N.

C.5. Major Service Interruptions

Appendix O reports Xcel's major service interruptions in 2024. Appendix O identified 492 major service interruptions and 118 major events that were not reported to the Commission's Consumer Affairs Office (CAO). The 2024 results for those two figures are 78% and 900% higher than the ten-year average. It also represents an increase of 62 percent in outage events from 2023 but a 900 percent increase in the number of events that were not reported to CAO.

The Company did attempt to explain this increase. Xcel stated that when there are many outages due to one event, the Control Center may not send an email for each outage event. If those emails are not sent to Xcel's Customer Advocate Group (CAG) which then relays that information to the CAO.

The Department requests Xcel, in reply comments, discuss potential process improvements to improve the Company's performance relative to having Control Center staff email the CAG so that CAG can notify the Commission's Consumer Affairs Office. The Department would like to review that information before making a recommendation.

Xcel also noted that it had no major service interruptions on its system in 2024 during which 10 percent or more of its Minnesota customers were out of service for 24 hours or more.

C.6. Worst Performing Feeders by Work Center

Minn R. 7826.0500 subp. 1.H. requires the Company:

H. to the extent technically feasible, circuit interruption data, including identifying the worst performing circuit in each work center, stating the criteria the utility used to identify the worst performing circuit, stating the circuit's SAIDI, SAIFI, and CAIDI, explaining the reasons that the circuit's performance is in last place, and describing any operational changes the utility has made, is considering, or intends to make to improve its performance;

Consistent with past reports, Xcel reported the twenty-five worst-performing feeders for each of its four work centers. Trade Secret Attachment M of Xcel's Petition provides that information and identifies the feeders which the Company considers a poor performer. Xcel includes additional information in Attachment M related to operational steps the Company is taking regarding those individual feeders' future reliability.

The Department acknowledges Xcel fulfilled the requirements of Minn. R. 7826.0500, subp. 1.H.

C.7. Compliance with ANSI Voltage Standards

Minn. R. 7826.0500 subp. 1.I. requires the Company to file:

I. data on all known instances in which nominal electric service voltages on the utility's side of the meter did not meet the standards of the American

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National Standards Institute for nominal system voltages greater or less than voltage range B,³⁸

Xcel reported it conducted 338 voltage investigations in 2024. After investigation the Company found approximately 30% (102) of these instances were caused by a specific voltage problem.³⁹ The number of investigations and the number of voltage problems diagnosed were 21% and 35% above the 10-year average in 2023, but only 6% higher and 10% lower respectively than the 2023 results.

The Department acknowledges Xcel fulfilled the requirements of Minn. R. 7826.0500, subp. 1.I.⁴⁰

C.8. Work Center Staffing Levels

Minn R. 7826.0500 1.J. requires the Company file:

J. data on staffing levels at each work center, including the number of full-time equivalent positions held by field employees responsible for responding to trouble and for the operation and maintenance of distribution lines;⁴¹

Xcel Energy provided work center staffing data for 2024.⁴² This information is summarized, along with a comparison to the three-year average of reported employee counts in the Department-created summary table below

Table 5: Staffing Levels by Work Center 2021-2024⁴³

Year	Metro East	Metro West	Northwest	Southeast	Other	Total
2021	135	188	32	58	50	463
2022	135	188	32	58	50	463
2023	135	193	29	50	56	463
3-yr Avg	135	190	31	55	52	463
2024	134	210	30	51	49	474
Var.	-1%	11%	-3%	-8%	-6%	2%

The Department acknowledges Xcel's fulfillment of the requirements of Minnesota Rules 7826.0500, subpart 1.J.⁴⁴

³⁸ [Minn. R. 7826.0500 subp. 1.I.](#)

³⁹ Petition at 69-70.

⁴⁰ [Minn. R. 7826.0500 subp. 1.I.](#)

⁴¹ [Minn. R. 7826.0500 1.J](#)

⁴² Petition at 78-79.

⁴³ Petition at 20 Table 23.

⁴⁴ [Minn. R. 7826.0500 1.J](#)

D. ANNUAL RELIABILITY REPORT – ORDER BASED REPORTING REQUIREMENTS

Like the Department’s review of Xcel’s efforts to comply with the operational and reporting requirements included in the Commission’s rules, this review of the reliability-related information required by Commission Order will mirror the outline Xcel used in the Petition.

D.1. 2024 Reliability Performance Summary and Plans

D.1.1. Public Facing Summary on Website

Order Point 8 of the Commission’s Order addressing Xcel’s 2021 SRSQ Report includes the following language:

8. Required Xcel Energy, Minnesota Power, and Otter Tail Power to each display, either directly or via a link to a PDF file, the utility’s public facing summary, as shown in Attachment A, on the utility’s website placed such that the summary is available to a website user after a single click away from the home page.⁴⁵

Xcel provided a copy of this document in Attachment I of the Petition.⁴⁶ Department staff visited Xcel Energy’s website to find where this information is located. The attachment is located under Outages → Outage & Safety → Minnesota Service Quality.⁴⁷

The Department concludes the Company complied with this requirement by both the inclusion of the summary as an attachment to its report and as an easily locatable location on the Company’s website.

D.1.2. Description of Policies, Procedures and Actions Company has Implemented or Plans to Implement, to Assure Reliability

Order points three and four of the Commission’s Order addressing Xcel’s 2013 SRSQ added the following requirements to the Company’s subsequent reports:

3. Required Xcel to augment its next filing to include a description of the policies, procedures and actions that it has implemented, and plans to implement, to assure reliability, including information on how it is demonstrating pro-active management of the system, increased reliability, and active contingency planning.⁴⁸

⁴⁵ 2021 SRSQ Order at Order Point 8.

⁴⁶ Petition at Attachment I.

⁴⁷ See [Minnesota Service Quality](#).

⁴⁸In the Matter of Xcel Energy’s 2013 Safety, Reliability and Service Quality Standards Report and Proposed Annual Reliability Standards for 2014, PUC Order, December 12, 2014, Docket No. E002/M-14-131 (eDockets) [201412-105351-01](#) at Order Points 3 and 4 (hereinafter “2013 SRSQ Order”).

4. Required Xcel to incorporate into its next filing a summary table that allows the reader to more easily assess the overall reliability of the system and identify the main factors that affect reliability.

Xcel provided a description of its reliability program development in Attachment J of the Petition.⁴⁹ The Department reviewed this attachment.

One of the programs Xcel discusses in Attachment J is the Vegetation Management (Veg. Mgmt.) program. According to Xcel:

The vegetation management program includes investigation of tree-related events causing large outages to determine if the outage would have been preventable if trimming had occurred the day before the outage.⁵⁰

Department IR #24 asked for the Company’s forecasted versus actuals for miles of tree-trimming planned and completed and the program’s expenses for 2018 through 2024.⁵¹

The Company provided this information. Tables 6a and 6b summarize this information.

Table 6a: Veg. Mgmt. - Completed Miles of Overhead Distribution and Transmission Lines 2018 – 2024 (miles/year)

Year	Number of Miles of Distribution Lines Trimmed per Year	Number of Miles of Transmission Lines Trimmed/Year
2018	2,307	768
2019	2,647	896
2020	1,606	762
2021	2,019	754
2022	2,239	807
2023	1,128	670
Avg.	1,991	776
2024	1,050	641
% Var.	-47%	-17%

Reviewing the information in Table 6.a, Xcel trimmed fewer miles of overhead distribution and transmission lines in 2023 and 2024 than it trimmed in 2022. In addition, the 2024 results when compared to average number of miles trimmed between 2018 and 2023, declined by 47% and 17%, respectively.

⁴⁹ Petition at Attachment J.

⁵⁰ Petition, Attachment J at 1.

⁵¹ A copy of this information request and Xcel’s response is included as Attachment DER-1.

Table 6.b provides the number of non-normalized and normalized tree-coded sustained customer interruptions increased in 2023 and 2024. The 2024 results for these two metrics were 135% and 73% higher than the six-year average (2018-2023).

Table 6b: Veg. Mgmt. - Normalized and Non-Normalized Tree-Coded Customer Interruptions by Work Center 2018 – 2024 (int. /year)⁵²

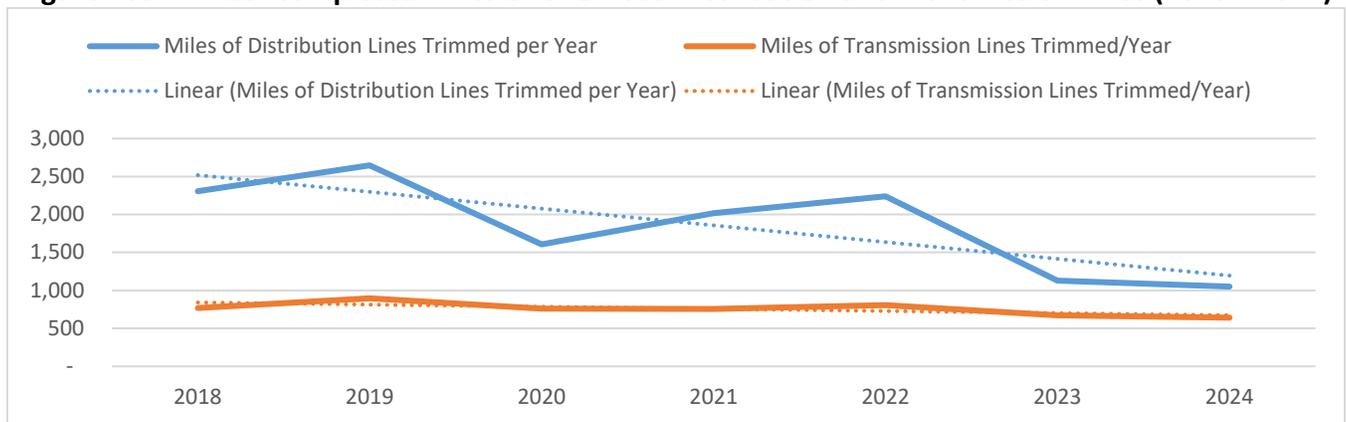
Year	Normalized	Non-normalized
2018	214,299	243,867
2019	170,994	242,158
2020	184,302	286,735
2021	168,848	285,454
2022	231,463	405,731
2023	247,376	444,037
Avg.	202,880	317,997
2024	350,300	747,861
% Var.	73%	135%

**Source: Minnesota Department of Commerce*

The results in the two tables appear consistent. If the Company trims fewer miles of overhead facilities, it would make sense that the number of normalized customer outages would increase.

Figures 10a and 10b provide this information visually.

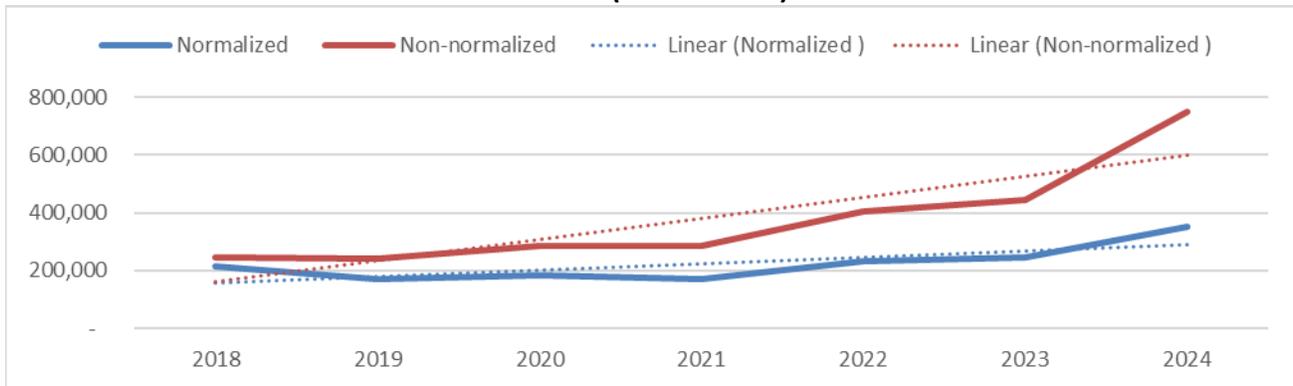
Figure 10a: Annual Completed Miles of Overhead Distribution and Transmission Lines (2018 – 2024)



**Source: Minnesota Department of Commerce*

⁵² Petition at 6, Attachment J at 6 Table 2.

Figure 10b: Annual Normalized and Non-Normalized Tree-Coded Customer Interruptions by Work Center (2018 – 2024)



**Source: Minnesota Department of Commerce*

The trend lines for the number of miles of distribution and transmission lines completed have been declining since 2018 in Figure 10a, while the trend lines for the normalized number of tree-coded customer interruptions in Figure 10b is upward sloping since 2018.

These results appear to be inconsistent with the Company’s efforts to improve reliability.

Xcel states in the Petition:

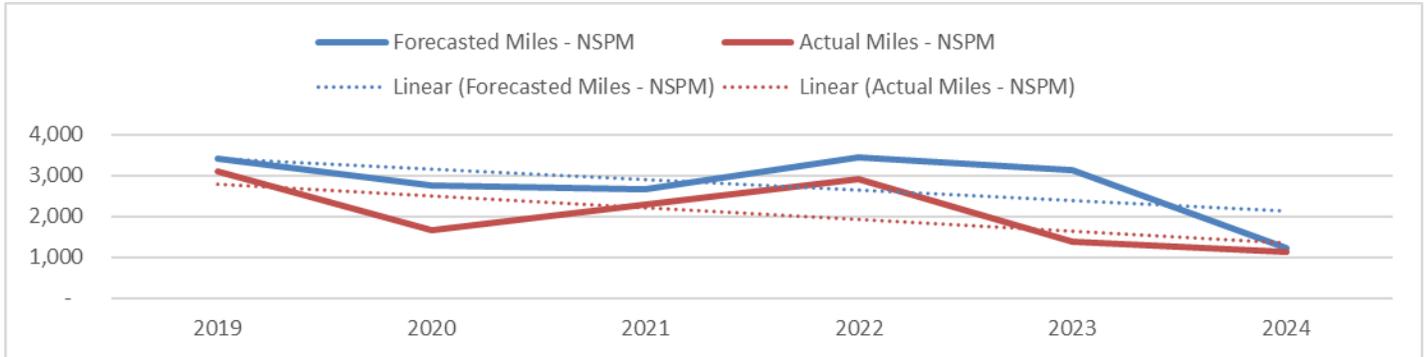
In 2024, [...], vegetation related causes accounted for the most customer outage minutes. Our Vegetation Management Program remains a highly valued program because it can impact outages during storms, in particular. [...] Tree pruning [...] is the selective removal of branches that pose an unacceptable safety or risk to the conductors. [...] The overall goal of our Vegetation Management Program is to maintain an approximate five-year cycle of continual vegetation maintenance. [Emphasis added].

In subpart a of DOC IR #24, the Department asked for the forecasted and actual miles of distribution and transmission lines the Vegetation Management Program planned for and then actually trimmed for 2019 through 2024.

The information Xcel provided in its response to DOC IR #24 was at the operating company level—NSP Minnesota or NSPM. The NSPM information includes not only Minnesota, but also the Company’s service territories in North and South Dakota. That clarification aside, the linear trend lines in Figure 11a are both downward sloping, which suggests that Xcel’s expectations for its distribution and transmission systems that needed to be trimmed annually was declining.

Figure 11a summarizes the information Xcel provided in its response.

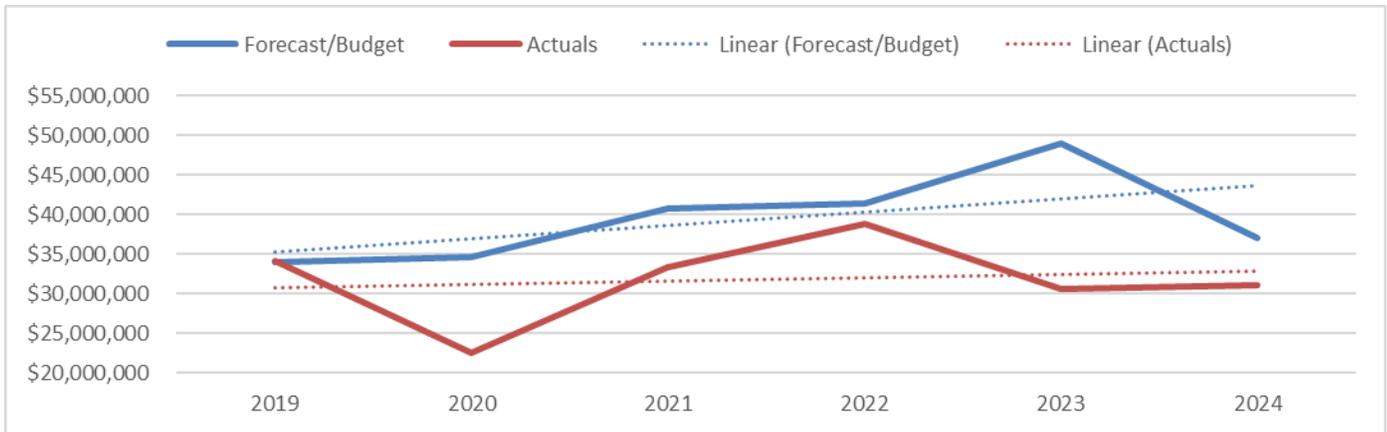
Figure 11a: NSPM Forecasted and Actual Miles Completed 2019-2024 from Response to DOC IR No. 24 (2019 – 2024) (miles/year)⁵³



**Source: Minnesota Department of Commerce*

In subpart b of DOC IR #24, the Department asked for the forecasted and actual cycles of continual vegetation management for 2019 through 2024. Figure 11b summarizes the information Xcel provided in its response.

Figure 11b: Budgeted and Actual Veg. Mgmt. Expense 2019-2024 from Response to DOC IR No. 24 (\$/year)⁵⁴



**Source: Minnesota Department of Commerce*

Xcel did increase its budgeted vegetation management expense from 2019 through 2023, then lowered it significantly in 2024. The Company’s actual vegetation management expense declined

⁵³ See Attachment DOC-1.

⁵⁴ See Attachment DOC-1.

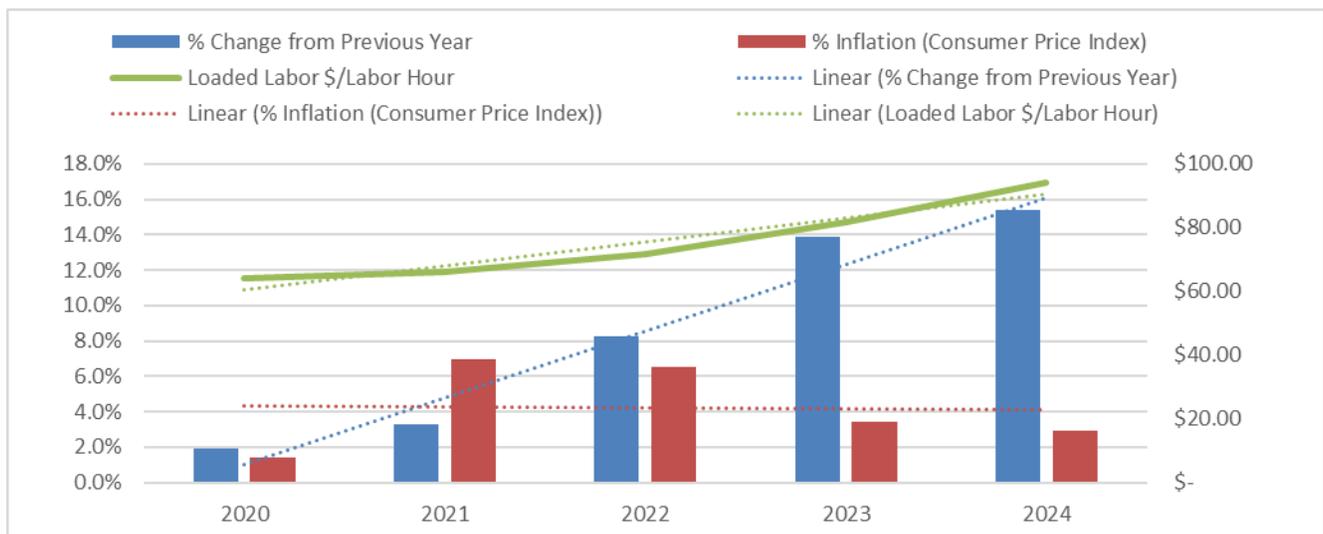
Analysts assigned: John Kundert, Rachel Wiedewitsch

significantly in 2020, increased in 2021 and 2022, decreased again to a level that was below the 2019 actual expense in 2023 and then increased slightly in 2024.⁵⁵

Apparently, the Company’s vegetation management expense grew slowly from 2019-2024 while the number of miles Xcel trimmed annually declined. That combination of factors will not improve system reliability.

In subpart c of that information request, the Department asked loaded labor rate/hour for the vegetation management Program for 2019 through 2024. Figure 11c summarizes the information Xcel provided in its response.

Figure 11c: Annual Percentage Change in Loaded Labor Rate/Hr. for the Veg. Mgmt. and Percentage Change in the CPI and Nominal Annual Loaded Labor Rate/Hr. for Veg. Mgmt. 2020 -2024 (percentage change and \$/hour)⁵⁶



**Source: Minnesota Department of Commerce*

The y-axis in Figure 11c is in percent and compares the annual percentage change in the vegetation management program’s loaded labor rate and the U. S. Consumer Price Index (CPI). The Company’s loaded labor rate for this program has increased faster than the CPI in every year except 2021. The trend lines associated with the two series in Figure 11.c illustrate that fact. The CPI trend line is flat to declining while the slope of the annual percentage change in the loaded labor rate for vegetation management demonstrates a significant upward slope. The z-axis in figure 11c provides Xcel’s nominal loaded labor rate per hour for this program. The loaded labor rate per hour increased from \$64.08 per hour in 2020 to \$94.22 per hour in 2024—a 47 percent increase. The average annual increase over those four years in the loaded labor rate per hour was 12%.

⁵⁵ The Department notes that the decline in the Veg. Mgmt. 2020 actuals was likely due to the impacts of the COVID-19 pandemic.

⁵⁶ Attachment DOC-1.

The Department notes that a slowly increasing Vegetation Management budget and actuals that are increasing at an even lower annual rate when combined with a rapidly increasing labor rate would naturally result in a declining number of miles of distribution and transmission lines being trimmed (i.e. not staying on the five-year trimming cycle). This result would be inconsistent with Xcel's stated goal of trimming its system on a five-year cycle. Trimming fewer miles of overhead line for a few years should result in a higher number of vegetation management related outages. That may have happened in 2024 assuming normal weather. The unusual weather in 2024 likely exacerbated the effect of not remaining on the five-year trimming schedule.

Specifically, the Department posits that the decline in the average number of miles trimmed annually between 2020 and 2024 resulted in the increasing number of Tree-Coded Customer Interruptions by work center (non-normalized and normalized). This decline led to an increase in outages and contributed to the decline in the Company's reliability factors in 2024. The Department will defer its recommendation on this issue until it has had the opportunity to review the requested information.

The Department requests that Xcel, in replies, include an explanation of the Company's rationale for: 1) not increasing the budget for the Vegetation Management Program beginning in 2022 when it was apparent that the program's labor costs were increasing at a rate well above inflation; and 2) why Xcel allowed the number of miles trimmed under the program decline from 2019 to 2024.

In Order Point 4 of the 2013 SRSQ Order, the Commission required Xcel to include summary information for the system in a tabular format that would allow the Commission to evaluate the overall reliability of the system and the factor affecting reliability.

The Company noted this reporting requirement in its discussion of Table 14A.⁵⁷ Table 14A includes ten-years of historical reliability indices and Major Event Day exclusions and has been a staple in Xcel's Reliability Report for several years. The Department agrees that given the Commission has not found Xcel to not be following this reporting requirement in the past, the Department believes the information in Table 14A in this year's filing is consistent with this reporting requirement.

The Department concludes Xcel has complied with the reliability reporting requirements in the 2013 SRSQ Order.

D.2. Reliability Metrics Information and Reporting Requirements

D.2.1. 2024 Benchmarks and Reporting

Order Points six and seven of the Commission's Order addressing Xcel's 2023 SRSQ Report set the following requirements for subsequent reports:

6. Xcel's 2024 statewide Reliability Standard is set at the IEEE benchmarking second Quartile for large utilities. Xcel's Southeast and

⁵⁷ Petition at 36.

Northwest work center reliability standards are set at the IEEE benchmarking second quartile for medium utilities. Xcel's Metro East and Metro West work center reliability center standards are set at the IEEE benchmarking second quartile for large utilities.

7. Xcel must file a supplement to its 2024 safety, reliability, and service quality report 30 days after IEEE publishes the 2024 benchmarking results, with an explanation for any standards the utility did not meet.⁵⁸

The Company included the Commission's 2024 benchmarks and agreed to the Commission's timeline for reporting in the Petition.⁵⁹

The Department concludes that Xcel has complied with these two reporting requirements.

D.2.2. Feeder Specific Reporting Requirements Required to be Included as a Downloadable . csv or . xlsx file

The Company identified a lengthy list of reporting requirements for feeder-specific information in the 2021 SRSQ Order.⁶⁰ The Company included this information from 2024 as Attachment L.⁶¹ The Department reviewed the information in Attachment L and notes that it is presented in an Excel format and that Xcel classifies quite a bit of it as Trade Secret information.

The Department concludes Xcel has complied with this reporting requirement.

D.2.3. Grid Modernization Investment Reporting Requirements

The Commission included the following reporting requirement in the 2019 SRSQ Order:

5. The utilities must file the reliability (SAIDI, SAIFI, CAIDI, MAIFI, normalized/non-normalized) for feeders with grid modernization investments such as Advanced Metering Infrastructure or Fault Location Isolation and Service Restoration to the historic five-year average reliability for the same feeders before grid modernization investments.⁶²

This Order Point identified the FLISR and Advanced Metering Infrastructure (AMI). Xcel included a discussion of its efforts to install and implement its grid modernization efforts. The Company is forecasting full deployment of the FLISR technology in 2027 and the AMI technology in 2025.⁶³

⁵⁸ 2023 SRSQ Order at Order Points 6 and 7.

⁵⁹ Petition at 32-33.

⁶⁰ 2021 SRSQ Order at Order Point 2.

⁶¹ Petition at Attachment L.

⁶² 2019 SRSQ Order at Order Point 5.

⁶³ Petition at 40 and 41.

The Department concludes Xcel has complied with this reporting requirement to the extent possible.

D.2.4. Various Reliability-Related Reporting Requirements

The Commission identified eleven reliability-related reporting requirements in Xcel's 2021 SRSQ Order.⁶⁴ Several of those reporting requirements also required non-normalized and normalized data be reported.⁶⁵

The Department addresses them in the order presented. The Department also notes that the affected utilities were required to provide normalized and non-normalized data for several metrics.

D.2.4.1. Non-normalized SAIDI, SAIFI and CAIDI values

Xcel provided this information in Table 14A for 2015 through 2024 under the "All Days" category.⁶⁶

The Department concludes Xcel has complied with this reporting requirement.

D.2.4.2. Normalized SAIDI, CAIDI, CEMI, and CELI calculated using the IEEE base method

Xcel provided normalized information using the 2.5 base method included in the IEEE 1366 standard for SAIDI and CAIDI in Table 14A for 2015 through 2023.⁶⁷ The Company provided normalized CEMI and CELI results for 2015 through 2023 in Graphs 16 and 18 of the Petition.⁶⁸ The Company provided this information using three different protocols for SAIDI and CAIDI in Table 14A.⁶⁹ Xcel provided the CEMI information normalized with IEEE new annual rules in Graph 16.⁷⁰

Xcel also noted in the Petition that the 2.5 beta method is outlined in IEEE 1366.⁷¹ The Department appreciates that clarification as the information in Table 14A in the Petition only refers to IEEE 1366 at the regional level in footnote 2 and 3 of that table.⁷²

The Department's commentary on normalized SAIDI, SAIFI, and CAIDI values is provided above.

The Department concludes Xcel has complied with this reporting requirement.

⁶⁴ 2021 SRSQ Order at Order Point 4.

⁶⁵ From the Department's perspective, normalizing data may be useful when looking at broad system trends such as SAIDI and SAIFI, and average customer impacts such as CAIDI and MAIFI can be deduced by these system trends. In contrast, the purpose of capturing CEMI and CELI is to better understand extremes (rather than averages), so normalizing this data seems to minimize the impact of multiple or lengthy interruptions experienced by customers by erasing the most extreme examples. Nonetheless, the Department can appreciate the usefulness of being able to compare normalized and non-normalized data.

⁶⁶ Petition at 36.

⁶⁷ *Ibid.*

⁶⁸ Petition at 78 and 80.

⁶⁹ Petition at 36.

⁷⁰ Petition at 78.

⁷¹ Petition at 73.

⁷² *Ibid.*

D.2.4.3. Non-normalized and Normalized MAIFI Information

Xcel provided this information in Tables 24 and 25 for 2015 through 2024 using two different normalization methods: the method included in the Company's QSP tariff and the method developed as part of the annual rules proceeding.⁷³ The Company also provided five years of historical MAIFI data that included trend lines using the All Days, QSP Tariff and Annual Rules protocols.^{74, 75} The trend lines for the QSP Tariff and Annual Rules protocols are both downward sloping which suggests improvements during that period. In addition, Xcel included a pareto chart showing the top causes for interruptions from 2020 through 2024.⁷⁶

Since Xcel has not completed the installation of all the AMI components on its distribution system which provide MAIFI, there are some limitations to this data.⁷⁷ For example, a comparison of MAIFIs from year-to-year is complicated by expanding system capabilities and changing procedures.

The Department concludes Xcel has complied with this reporting requirement.

D.2.4.4. ERT information within -90 minutes to 0 and within +1 to +30 minutes

Xcel explains its process for generating the initial estimated restoration times (ERT) and then the additional steps it takes to refine the initial estimate. The Company noted its default ERT is 3 hours if it does not have adequate information to make a specific estimate. Once field personnel arrive and begin their investigation, a second estimate is generated. A third estimate is calculated once the Company has determined the cause of the outage. The information used to generate those ERTs consists of a combination of forecasted values calculated by a computer model and ERTs entered by field personnel as well as control center staff.⁷⁸

⁷³ Petition at 67 and 68.

⁷⁴ MAIFI = Momentary Average Interruption Frequency Index.

⁷⁵ This reporting requirement appears to have subsumed two previous reporting requirements regarding MAIFI. The first related to "additional reporting of its currently available Momentary Average Interruption Frequency Index (MAIFI) data, such trend lines, to the extent available." See 2021 SRSQ Order at Order Point 4.c. The second required the Company to provide "an assessment of MAIFI data". See *In the Matter of Xcel Energy's 2015/2016 Safety, Reliability and Service Quality Standards Report and Proposed Annual Reliability Standards for 2014*, PUC Order, February 9, 2018, Docket Nos. E002/M-16-281 and E002/M-17-249 (eDockets) [20182-139908-02](#) at Order Point 3 (hereinafter "2015/2016 SRSQ Order").

⁷⁶ Ibid.

⁷⁷ Petition at 72.

⁷⁸ Petition at 67.

Figure 12: Percentage of ERT’s Whose Accuracy was within -90 to +0 (2018 – 2024)

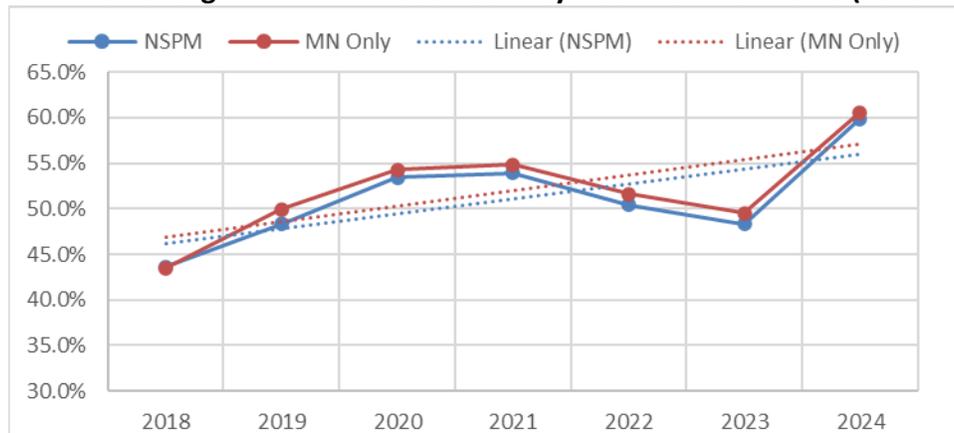


Figure 12 includes Xcel’s annual ERT accuracy for the -90 to 0 minutes from 2018 through 2024. The accuracy of the Company’s ERTs has improved between 2018 and 2024. The trend lines for both NSPM and Minnesota-only are upward sloping over that six-year period.

The Department concludes Xcel has complied with this reporting requirement.

D.2.4.5. Non-normalized and normalized CEMI at outage levels of 4, 5, and 6 interruptions⁷⁹

Xcel provided graphs for both non-normalized and normalized CEMI 4, 5 and 6 for 2015 – 2024.⁸⁰ The Department notes that the non-normalized results in Graph 17 suggest that the CEMI 4, 5 and 6 results in 2024 were the highest annual percentage of any year since 2015. The normalized results for 2024 resulted in it being the second highest percentage of customers having CEMI 4, 5 and 6 over that ten-year period.

Those results are consistent with the higher-than-average number of MEDs the Company mentioned in its normalization discussion.

The Department concludes Xcel has complied with this reporting requirement.

D.2.4.6. Highest number of interruptions experienced by one customer

The Company stated that 14 customers had the highest number of normalized outages at 18.⁸¹ Xcel’s customers that experience six or more outages a year do receive outage credits on their bills due to the terms of the Company’s Quality of Service tariff. While those outage credits are minimal, the QSP provides customers with some recompense for those outages.

⁷⁹ CEMI = Customers Experiencing Multiple Interruptions.

⁸⁰ Petition at 78 and 79.

⁸¹ Petition at 79.

The Department concludes Xcel has complied with this reporting requirement.

D.2.4.7. Non-normalized and normalized CELI at outage duration of greater than 6, 12, and 24 hours

Xcel provided the Company's non-normalized and normalized results for CELI 6, 12, and 24 hours results for the past ten years, including 2024.⁸² The Department notes that the non-normalized results in Graph 19 suggest that the CELI 6-, 12- and 24-hour results in 2024 were the highest annual percentage of any year since 2015. The normalized results for the 6-to-12-hour outage category for 2024 was the highest percentage of customers identified over the ten-year period.

Given the 2024 results for CEMI and CELI, it appears that the Company's ratepayers not only experienced more outages than normal in 2024, but ratepayers also suffered for longer outages as well. These results are consistent with Xcel's other reliability metrics for 2024. The Department will continue to monitor this situation.

The Department concludes Xcel has complied with this reporting requirement.

D.2.4.8. Longest interruptions experienced by one customer

Two customers located in the Metro East work center had an outage that lasted 4 days, 9 hours and 17 minutes.

The Department concludes Xcel has complied with this reporting requirement.

D.2.4.9. Performance and reliability factors by customer class

Xcel provided this information in Table 14B for Minnesota for 2024.⁸³ Trade Secret Attachment L also provides additional customer-related information that would be used to calculate those reliability metrics, but not the calculations.

The Department reviewed this information and found it to be consistent with its understanding of municipal zoning laws or regulations and average use by customer class.

The Department requests that Xcel, in reply comments provide the analysis underlying the performance and reliability factors by customer class included in Table 14B.

The Department concludes Xcel has complied with this reporting requirement.

D.2.4.10. Field office personnel information which includes the number of contractors by work center

⁸² Petition at 81.

⁸³ Petition at 40.

Analysts assigned: John Kundert, Rachel Wiedewitsch

This staff-related reporting requirement builds upon the staff-related reporting requirement identified in Minn. R. 7826.0500, sub. 1.J.⁸⁴ Xcel provided this information regarding contractor staffing levels in Table 23 in its Annual Report.⁸⁵ Table 7 summarizes the contractor-related information.

Table 7: Field Office Personnel - Contractors by Work Center (2020 – 2024)

Year	Metro East	Metro West	Northwest	Southeast	Other	Total
2020	2	9	1	2	1	15
2021	2	14	0	0	2	18
2022	4	12	0	0	5	21
2023	4	8	0	0	1	13
4-yr Avg	3	10.75	0.25	0.5	2.25	16.75
2024	5	7	0	0	1	13
Var.	67%	-35%	-100%	-100%	-56%	-22%

The total number of contractors in 2024 was twenty-two percent lower than the four-year average. Only the Metro East work center saw an increase in contractors used.

The Department concludes Xcel has complied with this reporting requirement.

D.2.4.11. Causes of sustained customer outages by work center

Xcel included this information in a series of graphs, Graphs 1, 1A, 1B, 1C and 1D.⁸⁶ The Department reviewed the information and concludes it is consistent with prior information submitted in previous dockets.

The Department concludes Xcel has complied with this reporting requirement.

D.2.4.12. Fault Location Isolation and Service Restoration (FLISR)⁸⁷

The Company also provides this information in Attachment J of the annual report. The Department reviewed the FLISR-related information Xcel provided. This topic is intimately connected to various aspects of the Company's efforts to modernize its distribution system.

The Department concludes the Company complied with this reporting requirement.

⁸⁴ The Department reviews that rule-related reporting requirement in section D.2.x.

⁸⁵ Petition at 71.

⁸⁶ Petition at 37-39.

⁸⁷ *In the Matter of the Application of Northern States Power Company dba Xcel Energy, for Authority to Increase Rates for Electric Service in Minnesota*, PUC Order, July 17, 2023, Docket No. E002/GR-21-630 (eDockets [20237-197559-01](#);) at Order Point 27(a).

D.3. *Reliability Standards for 2025*

The Company noted the Commission's January 13, 2025, Order in Docket No. E002/M-24-27 required the Company to use the following 2024 IEEE benchmarking results as Xcel's statewide 2024 proposed reliability standards:

- Statewide – second quartile for large utilities.
- Metro East work center - second quartile for large utilities;
- Metro West work center - second quartile for large utilities;
- Northwest work center - second quartile for medium utilities; and
- Southeast work center - second quartile for medium utilities.

The IEEE Distribution Reliability Working Group benchmarking performance for 2025 will not be available until the third quarter of 2026. Xcel will provide the IEEE 2024 reliability results later this year.⁸⁸

Regarding Xcel's proposed 2025 reliability standards, the Company requests the Commission approve the following:

- Statewide – second quartile for large utilities.
- Metro East work center - second quartile for large utilities;
- Metro West work center - second quartile for large utilities;
- Northwest work center - second quartile for medium utilities; and
- Southeast work center - second quartile for medium utilities.

It appears Xcel complied with the requirement in Minn. R. 7826.0600, subp. 1. Please see section III.C.1. for further commentary on Xcel's reliability performance and standards for 2024.

E. *ANNUAL SERVICE QUALITY REPORT – RULES-BASED REPORTING REQUIREMENTS*

Minn. R. 7826.1300 requires:

On or before April 1 of each year, each utility shall file a report on its service quality performance during the last calendar year. These filings must be treated as "miscellaneous tariff filings" under the commission's rules of practice and procedure, part 7829.0100, subpart 11. This report must include at least the information set forth in parts 7826.1400 to 7826.2000.⁸⁹

The requirements of each rule part are discussed in the sections below.

⁸⁸ Petition at 3.

⁸⁹ [Minn. R. 7286.1300](#)

E.1. Meter Reading Performance

Minn R. 7826.1400 states:

The annual service quality report must include a detailed report on the utility's meter-reading performance, including, for each customer class and for each calendar month:

- A. the number and percentage of customer meters read by utility personnel;
- B. the number and percentage of customer meters self-read by customers;
- C. the number and percentage of customer meters that have not been read by utility personnel for periods of six to 12 months and for periods of longer than 12 months, and an explanation as to why they have not been read; and
- D. data on monthly meter-reading staffing levels, by work center or geographical area.⁹⁰

The Department summarizes the monthly Company-read meter results included in the Petition below.

Table 8: Company Read Meters 2019-2024⁹¹

Line No.	Year	Avg. # of Meters	Total Avg # of Meters	Annual Percentage Read
1.	2019	1,786,389	1,789,124	99.8%
2.	2020	1,805,656	1,808,598	99.8%
3.	2021	1,828,863	1,834,673	99.7%
4.	2022	1,741,969	1,855,248	93.9%
5.	2023	1,873,274	1,877,408	99.8%
6.	5-Year Avg	1,807,230	1,833,010	98.6%
7.	2024	1,896,342	1,900,999	99.8%

**Source: Minnesota Department of Commerce*

An annual average of 99.8% of customer meters were read by utility personnel in 2024, identical to the percentage read in 2023. The 2024 results are above the five-year historical average.⁹²

⁹⁰ [Minn. R. 7286.1400](#)

⁹¹ Petition at Attachment C.

⁹² The Department decided to use a five-year historical average in this year's SRSQ instead of a ten-year average. Xcel's soon-to-be completed installation of its AMI system and the resulting technological improvement contributed to the Department's decision.

Table 9 summarizes the number of meters not read by utility personnel for 6-12 months from 2019 to 2024.

Table 9: Meters Not Read for 6-12 Months by Customer Class 2019 – 2024⁹³

Year	Residential	Commercial	Industrial	Other	Total
2019	1,678	874	257	11	2,820
2020	1,794	953	135	13	2,895
2021	2,325	809	99	4	3,237
2022	11,765	1,196	125	11	13,097
2023	16,857	2366	175	4	19,402
5 Yr. Avg	6,884	1,240	158	9	9,658
2024	6,462	1345	182	10	7,999
5-Yr Var	-6%	9%	15%	16%	-17%
1-Yr Var	-62%	-43%	4%	150%	-59%

**Source: Minnesota Department of Commerce*

The number of residential meters not read for 6 to 12 months declined for the residential and commercial classes from 2023 to 2024. The 2024 results for those two classes were also below the five-year averages. The number of meters not read for 6 to 12 months increased for the industrial and other customer classes. Given the relatively small number of customers in those two classes, this result does not concern the Department. The 2024 total for this metric was 59 percent lower than the 2023 results and 17 percent lower than the five-year average. The Department assumes the Company’s meter-reading performance will improve in the future, given that it will have completed the installation of its new AMI system.

Table 10 provides the number of meters not read for over 12 months by class. The 2024 results for the residential, commercial and industrial meters not read for over a year were higher than the five-year average (59 percent, 80 percent and 31 percent respectively). That same figure for the other class was 46 percent below the five-year average. Xcel’s 2024 results were also higher than its 2023 results for the commercial, industrial and other classes, while the same metric for the residential class was lower. Like the previous discussion, the Department assumes this metric will improve in 2025 and beyond.

⁹³ Petition at Attachment C.

Table 10: Meters Not Read for Longer than 12 Months by Customer Class 2019 – 2024⁹⁴

Year	Residential	Commercial	Industrial	Other	Total
2019	583	606	310	50	1,549
2020	773	684	116	40	1,613
2021	639	674	158	20	1,491
2022	2,112	784	91	25	3,012
2023	3,444	1020	142	14	4,620
5 Yr. Avg	1,510	754	163	30	2,457
2024	2,394	1356	214	16	3,980
5-Yr Var	59%	80%	31%	-46%	62%
1-Yr Var	-30%	33%	51%	14%	-14%

**Source: Minnesota Department of Commerce*

Minn. R. 7826.1400(D) requires monthly data on meter-reading staffing levels, by work center or geographical area. Xcel provided information by work center and stated that its meter reading staff was combined with field representative staff in 2023. The combination of its meter reading and field representative staff allowed for the creation of a larger team that could then be cross-trained. This re-organization effectively made pre-2023 information useless, so Table 11 provides the 2023 and 2024 results and compares the 2024 results to the previous year.

Table 11: Meter Reading Staff Levels by Work Center 2024 and 2023⁹⁵

Year	Metro East	Metro West	Northwest	Southeast	Other	Total
2023	6.8	8.3	3	4.3	6.4	28.8
2024	9.0	7.0	4.0	4.0	5.0	29.0
5-Yr Var	35%	-21%	60%	27%	-12%	NA

The Metro East and Northwest work centers saw an increase in 2024, and the remaining categories saw their meter-reading headcount decrease. The overall staffing level remained constant. The changes by work center were due to a re-allocation of staff resources.

A statement in Attachment C of the Service Quality Report that discussed the removal of “deleted meters” prompted the Department to send the Company an information request on that topic. In that information request, the Department asked for the total number of meters installed at the end of December 2024 in nominal and percentage terms. Xcel responded that it had removed 3,927 meters or 0. 2% of the total population of installed meters.

⁹⁴ Petition at Attachment C.

⁹⁵ Petition at 6.

Analysts assigned: John Kundert, Rachel Wiedewitsch

Subpart b of that IR asked for information about the process whereby a meter that is not physically installed at a premise is classified as being installed. Xcel explained in its response that the discrepancy is due to a timing lag between the meter management system and the billing system and typically involves a meter being removed from service and noted in the meter management system and not in the billing system. Apparently, a manual exercise needs to be completed to update Xcel's billing system in this regard.

Subpart c asked if the removal of the deleted meters would influence the Company's rate base in a general rate case. The Company's response was that it would have no effect as the uninstalled meters would be returned to inventory and then be used again.⁹⁶

The Department acknowledges Xcel fulfilled the requirements of Minnesota Rules 7826.1400.

E.2. Involuntary Disconnections

Minn. R. 7826.1500 states that:

The annual service quality report must include a detailed report on involuntary disconnections of service, including, for each customer class and each calendar month:

- A. the number of customers who received disconnection notices;
- B. the number of customers who sought cold weather rule protection under Minnesota Statutes, sections 216B.096 and 216B.097, and the number who were granted cold weather rule protection;
- C. the total number of customers whose service was disconnected involuntarily and the number of these customers restored to service within 24 hours; and
- D. the number of disconnected customers restored to service by entering a payment plan.⁹⁷

The following table summarizes residential customer disconnection statistics reported by Xcel in its annual reports.

⁹⁶ Attachment DOC-2.

⁹⁷ [Minn. Rules. 7826.1500](#)

Table 12: Residential Customer Involuntary Disconnect Information 2019-2024^{98, 99}

Year	Received Disconnect Notice	Sought CWR Protection	Granted CWR Protection	% Granted	Disconnected Involuntarily	Restored within 24 Hours	% Restored within 24 Hours	Restored by Entering Payment
2019	521,548	80,713	80,713	100.0%	16,693	6,318	37.8%	4,250
2020	222,803	58,225	58,225	100.0%	2,820	1,610	57.1%	969
2021	357,851	80,143	80,143	100.0%	6,292	3,466	55.1%	3,889
2022	668,855	126,910	126,910	100.0%	8,538	3,197	37.4%	5,533
2023	774,507	132,831	132,831	100.0%	24,722	11,126	45.0%	12,248
5-Yr. Avg.	509,113	95,764	95,764	100.0%	11,813	5,143	43.5%	5,378
2024	734,696	118,059	118,059	100.0%	52,549	30,019	57.1%	26,040
5 Yr. % Var	44%	23%	23%	100.0%	153%	183%		384%
10-Yr Avg	693,240	112,281	112,281	100.0%	16,848	6,840	40.6%	3,361
10-Yr % Var	6%	5%	5%		212%	339%		675%

**Source: Minnesota Department of Commerce*

The Company reported that 734,696 disconnection notices were sent to residential customers in 2024.¹⁰⁰ All customers seeking cold weather rule protection were granted it. The percentage of disconnections restored within 24 hours for 2024 equaled the highest percentage of the past five years (2020).

The eviction moratorium that was initiated during the early part of the COVID-19 pandemic ended in 2021,¹⁰¹ and as expected, disconnection notices increased in subsequent years with a peak of 774,696 notices sent in 2023. This figure is down slightly in 2024.

The change in the percentage variances comparing Xcel's 2024 results to ten- and five-year averages provides a perspective of how the involuntary disconnection process has changed over that time. The number of customers receiving disconnection notices in 2024 was only 6 percent higher than the ten-year average, but 44 percent above the five-year average. The results for the number of customers seeking and receiving CWP protection are similar at 5 percent and 23 percent. The number of involuntary disconnections and those having their electric service restored in 24 hours increased at much higher rates, 212 percent and 339 percent compared to the ten-year averages and 153 percent and 183 percent compared to the five-year averages. The percentage of customers who had their electric service restored by entering a payment plan in 2024 increased 675 percent and 384 percent when compared to the ten and five-year averages.

⁹⁸ Petition at Attachment E. The 2024 data was retrieved from Attachment E. Historic data retrieved from prior filings.

⁹⁹ *In the Matter of Xcel Energy's 2024 Safety, Reliability and Service Quality Standards Report*, Department Comments, June 14, 2024, Docket No. E002/M-24-27 (eDockets) [20246-207715-02](#) at 12, Table 6. Historic data for 2019-2023 was retrieved these Table 6 of those comments.

¹⁰⁰ Petition at Attachment E.

¹⁰¹ The disconnection moratorium was in effect from March 2020 to August 2021. See Docket E, G999/CI-20-375.

Analysts assigned: John Kundert, Rachel Wiedewitsch

In summary, Xcel's 2024 results were only slightly higher than the ten-year average for the number of customers who received a disconnection notice and those that sought and were granted CWR protection. The number and percentage of customers who were disconnected involuntarily, had their service restored within 24 hours, and those who entered a payment plan to have their service reconnected increased significantly compared to both the ten- and five-year averages.

To get a better understanding of the magnitude of the effects of the Company's use of remote involuntary disconnection, the Department, in an Information Request, asked for the percentage of customers eligible for disconnection how many did the Company disconnect in 2023, 2024 and year-to-date (YTD) 2025.

Xcel responded that it had disconnected 5 percent of eligible customers in 2023 and 14 percent in 2024 and 8 percent through the end of April 2025.

In addition, the Department asked for the percentage of customers that were disconnected in 2024. The Company responded that the figure was 3 percent of customers.¹⁰²

Given that the scope of this section of 7826.1500 is limited to 1) the number of customers who received disconnection notices, 2) the number of customers who requested CWR protection; 3) the number of customers who were granted CWR protection; 4) the total number of customers whose service was disconnected involuntarily, 5) the number of customers that were reconnected within 24 hours and 6) the number of customers restored to service under a payment plan, the Department believes Xcel has fulfilled the reporting requirements of Minnesota Rules 7826.1500. The Department concludes the Company has complied with the rule.

E.3. Service Extension Request Response Times

Minn. R. 7826.1600 states that:

The annual service quality report must include a report on service extension request response times, including, for each customer class and each calendar month:

A. the number of customers requesting service to a location not previously served by the utility and the intervals between the date service was installed and the later of the in-service date requested by the customer or the date the premises were ready for service; and

B. the number of customers requesting service to a location previously served by the utility, but not served at the time of the

¹⁰² Attachment DOC-3.

request, and the intervals between the date service was installed and the later of the in-service date requested by the customer or the date the premises were ready for service.¹⁰³

Xcel reported 6,966 residential and 1,062 commercial customers requested service to a location the Company had not previously served in 2024.¹⁰⁴ The average interval between request/readiness date and installation date was 29.7 days for residential and 31.1 days for commercial customers.

The Company added roughly 8,000 new residential and commercial customers in 2024. While this addition was 13 percent below the 2023 figure, it was the second highest number of new customers since 2003.

Table 13 below summarizes Xcel’s 2024 service extension request data.

Table 13: Service Extension Requests – Previously Unserved - 2020 - 2024¹⁰⁵

Year	Residential		Commercial	
	#/installations	Avg #/days to complete	#/installations	Avg # of days to complete
2020	5,887	5.5	607	4.0
2021	5,346	5.7	218	12.0
2022	4,521	12.0	225	16.6
2023	8,256	23.2	925	19
4-yr Avg	6,003	12	494	13
2024	6,966	29.7	1,062	31.1
4 Yr Var	16%	156%	115%	142%
1 Yr Var	-16%	28%	15%	65%

**Source: Minnesota Department of Commerce*

The “average number of days to complete” a service extension request for residential customers in 2024 was 156 percent higher than the four-year average and 28 percent higher than the 2023 figure. That same metric for commercial customers in 2024 was 142 percent higher than the four-year average, and 65 percent higher than the 2024 figure. The residential and commercial average number of days to complete in 2024 were the highest the Company has reported since at least 2009. Xcel attributed at least part of the increases in response times to supply chain issues and inflation.

In an Information Request, the Department asked for some additional analytical support for Xcel’s contention that supply chain issues were still affecting its ability to extend service to locations the Company has not previously served.¹⁰⁶

¹⁰³ [Minn. R. 7826.1600](#)

¹⁰⁴ Petition at 9.

¹⁰⁵ Petition at 10, Tables 2A and 2B.

¹⁰⁶ Petition at 11.

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In subpart a of that Information Request, the Department asked for a narrative that delineated the pressures in the Company's supply chains and the effects of inflation on the Company.

The Company responded:

Xcel Energy has continued to face industry-wide pressures between 2021 and 2024 for both supply chains and inflation. Xcel Energy suppliers increased their production timelines multiple times over that time, with lead times exceeding 52 weeks for most transformers. Additionally, the cost of transformers has increased an average of 154% since 2020.¹⁰⁷

Regarding the reporting requirement included in subpart B of Minn. Rule 7826.1600, the Company apparently changed its approach for determining this figure such that it is now more consistent with the explanation included in the rule. Subpart B of Minn. Rule 7826.1600 specifically asks in part, for "the number of customers requesting services to a location previously serviced by the utility, but not served at the time of the request."¹⁰⁸

Xcel provided that information in Table 2C and 2D.¹⁰⁹ In previous SRSQ reports, Xcel included the number of customers who had requested service to a location previously served in the year under review.¹¹⁰

The figures associated with this new approach are provided in Table 14.

Table 14: Service Reconnection Requests – Previously Served – 2024

Year	Residential		Commercial	
	#/installations	Avg #/days to complete	#/installations	Avg #/days to complete
2024	17,287	0.2	484	1.0

Given that the Department identified this change shortly before submitting its comments, the Department requests Xcel, in reply comments, confirm or correct the Department's interpretation of the information provided in the Petition in Tables 2C and 2D in its reply comments.

The Department will provide a recommendation regarding these reporting requirements after reviewing the Company's reply comments.

The Department also notes that the additional information the Commission required related to this topic in order point 14 in its 2023 SRSQ Order. The Department's review of that information is found in Part 3 of 3 of the Petition.

¹⁰⁷ Attachment DOC-4.

¹⁰⁸ Minn. R. 7826. 1600 - [7826. 1600 - MN Rules Part](#).

¹⁰⁹ Petition at 10-11.

¹¹⁰ For example, see Xcel's Petition in Docket No. E002/24-27 at 10, dated April 1, 2024. (eDockets): [20244-204891-01](#).

E.4. Call Center Response Times

Minn. R. 7826.1200 (Call Center Response Times) states:

Subpart 1. Calls to business office. On an annual basis, utilities shall answer 80 percent of calls made to the business office during regular business hours within 20 seconds. "Answer" means that an operator or representative is ready to render assistance or accept the information to handle the call. Acknowledging that the customer is waiting on the line and will be served in turn is not an answer. If the utility uses an automated call-processing system, the 20-second period begins when the customer has selected a menu option to speak to a live operator or representative. Utilities using automatic call-processing systems must provide that option, and they must not delay connecting the caller to a live operator or representative for purposes of playing promotional announcements.

Subp. 2. Calls regarding service interruptions. On an annual basis, utilities shall answer 80 percent of calls directed to the telephone number for reporting service interruptions within 20 seconds. "Answer" may mean connecting the caller to a recording providing, to the extent practicable, at least the following information:

- A. the number of customers affected by the interruption;
- B. the cause of the interruption;
- C. the location of the interruption; and
- D. the utility's best estimate of when service will be restored, by geographical area.¹¹¹

Minn R. 7826.1700 builds on the Minn R. 7826.1200 by requiring reporting requirements for call center response times. Minn. R. 7826.1700 requires:

The annual service quality report must include a detailed report on call center response times, including calls to the business office and calls regarding service interruptions. The report must include a month-by-month breakdown of this information.¹¹²

According to Minn. R. 7826.1700, the annual service quality report must include a detailed report on monthly call center response times, including calls to the business office and calls regarding service

¹¹¹ [Minn. R. 7826.1200](#)

¹¹² [Minn. R. 7826.1700](#)

Analysts assigned: John Kundert, Rachel Wiedewitsch

interruptions.¹¹³ Further, Minnesota Rules 7826.1200 requires that 80% of calls during business hours be answered within 20 seconds.¹¹⁴ Table 15 summarizes that information.¹¹⁵

Table 15: Call Center Response Times - 2024¹¹⁶

Line No.	Category	Calls - Agents	Answered.< 20 Sec.	%
1.	Residential	831,994	351,301	42.22%
2.	BSC	54,019	28,251	52.30%
3.	Credit	287,075	112,434	39.17%
4.	PAR	48,930	28,983	59.23%
5.	Total	1,222,018	520,969	42.63%
		Calls - IVR	Answered.< 20 Sec.	%
6.	Nonbilling Nonoutage	669,088	669,088	100.00%
7.	Billing	1,362,568	1,362,568	100.00%
8.	Outage	414,042	414,042	100.00%
9.	Total	1,776,610	1,776,610	100.00%
		Outage calls	Answered.< 20 Sec.	%
10.	Agents	214,748	91,551	42.63%
11.	IVR	199,294	199,294	100.00%
12.	Total	414,042	290,845	70.25%
	Xcel	All calls	Answered.< 20 Sec.	%
13.	Line 5 + Line 8	1,636,060	720,263	44.02%
14.	Line 5 + Line 7 + Line 11	2,783,880	2,297,579	82.53%
	Department	All calls	Answered.< 20 Sec.	%
15.	Line 5 + Line 6 + Line 8 + Line 12	3,667,716	2,843,470	77.53%

**: Minnesota Department of Commerce*

Xcel did not meet the requirement to answer 80% of calls during business hours within 20 seconds in 2024.

The Company identified “staffing challenges and severe weather events” as the main drivers for its 2024 call center performance.¹¹⁷ Xcel also mentioned that it was increasing its staffing levels with the goal of meeting the QSP Telephone Response Metric in 2025.¹¹⁸

¹¹³ *Ibid.*

¹¹⁴ [Minn. R. 7826.1200](#)

¹¹⁵ Xcel’s QSP Tariff also includes this threshold.

¹¹⁶ Petition at Attachment F. Calculations in Table 15 are based on data provided in Xcel’s Attachment F and may differ from Xcel’s numbers.

¹¹⁷ Petition at 13.

¹¹⁸ *Ibid.*

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In the reliability section of the Petition, the Company did provide support for its assertion that the weather in 2024 in its Minnesota service territory had a relatively high number of storms. Considering that information, the Department focused on Xcel's apparent staffing challenges.

In IR #15, the Department asked Xcel to identify the factors contributing to a challenging hiring market and what changes, if any, had the Company made to its recruiting efforts for new agents in response.

In its response, Xcel did not reply to the Department's question regarding the state of the hiring market but did identify the following changes it had made in response:

- Enhanced its job advertising to attract more candidates;
- Updated the position's job description;
- Contacted potential candidates via Xcel Energy's Recruiting Team; and
- Increased the starting wage from \$18 to \$20 an hour (11% increase).¹¹⁹

The Department concludes Xcel complied with the reporting requirements included in Minnesota Rules 7826.1200 and 7826.1700.

The Department discusses the reporting requirement included in the Commission Order's from docket no. E002/M-04-511 regarding this topic in the next section.

E.5. Emergency Medical Account Status

According to Minn. R. 7826.1800, the reporting on emergency medical accounts (EMA) must include the number of customers who requested emergency medical account status under Minn. Stat. § 216B.098, subd. 5, the number of applications granted, the number of applications denied, and the reasons for each denial.¹²⁰ Minn R. 7826.1800 states:

The annual service quality report must include the number of customers who requested emergency medical account status under Minnesota Statutes, section [216B.098](#), subdivision 5,¹²¹ the number whose applications were granted, and the number whose applications were denied and the reasons for each denial.¹²²

¹¹⁹ Attachment DOC-5.

¹²⁰ [Minn. R. 7826.1800](#)

¹²¹ [Minn. Stat. §216B.098 subd. 5](#) (Medically necessary equipment) states: "(a) A utility shall reconnect or continue service to a customer's residence where a medical emergency exists or where medical equipment requiring electricity necessary to sustain life is in use, provided that the utility receives written certification, or initial certification by telephone and written certification within five business days, that failure to reconnect or continue service will impair or threaten the health or safety of a resident of the customer's household[...]"

¹²² [Minn. R. 7826.1800](#)

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Xcel reported as of December 31, 2024, 2,013 customers had requested and received EMA status in 2024.¹²³ This figure is 8 percent lower than the number of customers enrolled in 2023. The number of customers requesting EMA status in 2024 was 10 percent higher than ten-year average. The number of customers granted EMA status in 2024 was also 10 percent higher compared to the ten-year average. Table 16 provides this information.

The focus on the annual enrollment figure provides an incomplete picture of the EMA program. Since EMA status must be requested and approved annually, there is significant erosion in the number of customers with EMA status. Xcel stated that its records identified 2,135 customers as having EMA status.¹²⁴

Table 16: Emergency Medical Account Requested and Granted - 2014 -2024

Year	Requested EMA Status	Granted EMA Status	% Granted
2014	1,780	1,012	56.9%
2015	3,333	2,557	76.7%
2016	3,427	2,713	79.2%
2017	3,150	2,388	75.8%
2018	2,818	2,267	80.4%
2019	2,420	2,196	90.7%
2020	986	935	94.8%
2021	1,084	971	89.6%
2022	1,222	1,079	88.3%
2023	2,614	2,193	83.9%
10-Yr Avg	2,283	1,831	80.2%
2024	2,501	2,013	80.5%
1 Yr Var.	-4%	-8%	NA
10-Yr Var	10%	10%	NA

Source: Minnesota Department of Commerce

The Department acknowledges Xcel's fulfillment of the requirements of Minnesota Rules 7826.1800.

The Department addresses the EMA-related reporting requirements in Order Points 4 and 5 of the Commission's Order in Docket No. E002/M-²²⁻²³³¹²⁵ in sections G.3, G.4 and G.85. respectively and Order Point 25 of the Commission's 2024 SRSQ Order in Part 3 of 3 of the Petition.

¹²³ Petition at 14. Medical Account status must be requested and approved annually.

¹²⁴ *Ibid.*

¹²⁵ Remote Reconnection Variance Order at 4 and 5.

E.6. Customer Deposits

Minn. R. 7826.1900 requires:

The annual service quality report must include the number of customers who were required to make a deposit as a condition of receiving service.¹²⁶

According to the Company, it requested 436 deposits from residential customers as a condition of receiving service in 2024.¹²⁷

Table 17 summarizes the number of accounts for which Xcel reported required deposits over the past 11 years. The Department notes the Company requests these deposits from residential customers who have filed for bankruptcy. The 2024 number of deposits required was 7 percent higher than the number of deposits required in 2023, but 6 percent below the 10-year average.

Table 17: Customer Deposits Required 2014 –2024

Year	# of Deposits
2014	606
2015	561
2016	362
2017	314
2018	394
2019	486
2020	678
2021	583
2022	237
2023	409
10-Yr Avg	463
2024	436
1-Yr Var	7%
10-Yr Var	-6%

Source: Minnesota Department of Commerce

Xcel’s 2024 results appear to be reasonable.

With the Company’s reporting of the number of customer deposits required, the Department acknowledges Xcel’s fulfillment of the requirements of Minnesota Rules 7826. 1900.

¹²⁶ [Minn. R. 7826. 1900](#)

¹²⁷ Petition at 15.

E.7. Customer Complaints

Minn. R. 7826.2000 requires the reporting of customer complaints in the Company's SRSQ report:

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

- A. the number of complaints received;
- B. the number and percentage of complaints alleging billing errors, inaccurate metering, wrongful disconnection, high bills, inadequate service, and the number involving service-extension intervals, service-restoration intervals, and any other identifiable subject matter involved in five percent or more of customer complaints;
- C. the number and percentage of complaints resolved upon initial inquiry, within ten days, and longer than ten days;
- D. the number and percentage of all complaints resolved by taking any of the following actions:
 - (1) taking the action the customer requested;
 - (2) taking an action the customer and the utility agree is an acceptable compromise;
 - (3) providing the customer with information that demonstrates that the situation complained of is not reasonably within the control of the utility; or
 - (4) refusing to take the action the customer requested; and
- E. the number of complaints forwarded to the utility by the commission's Consumer Affairs Office for further investigation and action.¹²⁸

In 2024, Xcel received 1,981 complaints 1,468 of which were forwarded by the CAO.¹²⁹ The Company provided data showing 17 percent of all complaints Xcel's Customer Advocate Group handled in 2024

¹²⁸ [Minn. R. 7826.2000](#)

¹²⁹ Petition at Attachment G.

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were resolved within 10 days.¹³⁰ The most frequent complaint category was “Inadequate Service: Programs and Services” at 33.7 percent.¹³¹

Table 18 summarizes Xcel’s customer complaint history received through the Company’s Customer Advocate Group (CAG) since 2019.

The Department notes that as the number of formal complaints increased from 1,223 in 2023 to 1,981 in 2024 (62 percent). The Company’s 2024 results were also 181 percent about the five-year average. The number of complaints forwarded by the CAO was 93 percent higher than the 2023 figure and 271 percent higher than the five-year average.

The Department considers this complaint metric to be a useful benchmark in terms of assessing Xcel’s service quality performance, perhaps the most important of any service quality metric. Xcel’s 2024 results concern the Department and it will monitor Xcel’s future results closely.

Table 18: Customer Complaint Selected Summary (2019 – 2024)¹³²

Year	# of Complaints	# Forwarded by CAO	% Resolved on Initial Inquiry	% Resolved by Taking Action Customer/Utility Agreed on	Top Complaint Category
2019	756	396	99.90%	99.07%	Billing Errors
2020	430	239	99.77%	97.38%	Inadequate Service (IS)
2021	484	257	97.48%	99.50%	IS
2022	635	330	99.83%	96.22%	IS
2023	1,223	759	99.69%	96.45%	Billing Error
5-Yr Avg	706	396	99.33%	97.72%	NA
2024	1,981	1,468	99.83%	97.69%	IS: Programs and Services
5 Yr Avg Var.	181%	271%	0.50%	-0.03%	NA
1 Yr Var	62%	93%	0.14%	1.29%	NA

**Source: Minnesota Department of Commerce*

The Company’s QSP tariff also includes an annual complaint metric. Xcel noted in its annual compliance filing in that proceeding that it had exceeded its complaint threshold for that metric in 2024 and would be paying an under-performance penalty to ratepayers in 2025. The Company also included a discussion regarding the potential for updating the existing annual complaint threshold calculation for the QSP. The Department is participating in that docket and attempting to gather enough information to develop an understanding of the drivers for the large increase in Xcel’s complaint numbers in 2024 (and 2023). One potential outcome of that review would be to modify the Company’s operations to the extent possible to slow or eliminate this increase.

“Inadequate Service: Programs and Services” was complaint category with the highest number of complaints in 2024. Inadequate Service: Programs and Services is a complaint sub-category that was one of four sub-categories developed to provide more detailed information regarding customer

¹³⁰ Id.

¹³¹ Id.

¹³² Petition at Attachment G. Attachment G includes the 2024 information. Historic data retrieved from prior Xcel filings.

complaints after the Commission determined that level of detail was requirement in the reporting requirement.¹³³

The Department acknowledges Xcel's fulfillment of the requirements of Minnesota Rules 7826.2000.

F. ANNUAL SERVICE QUALITY REPORT – ORDER BASED REPORTING REQUIREMENTS

Like the Department's review of Xcel's efforts to comply with the operational and reporting requirements included in the Commission's rules, this review of the service quality-related information required by Commission Order will use the outline Xcel used in the Petition.

F.1. Investigation into Xcel Energy's Inaccurate Gas Meters, Recalculation of Bills and Related Issues (Docket No. G002/CI-08-871) and Service Rules Tariff Modification (Docket No. E,G002/M-09-22)

In the Commission's November 30, 2010, Order in Docket Nos. G002/CI-08-871 and E,G002/M-09-224, at Order Point 2,¹³⁴ the Commission directed the Company to file the following information with its annual electric service quality reports filed pursuant to Minnesota Rules 7826.0500:

- Volume of Investigate and Remediate Field orders.
- Volume of Investigate and Refer Field orders.
- Volume of Remediate Upon Referral Field orders.
- Average response time for each of the above categories by month and year.
- Minimum days, maximum days, and standard deviations for each category.
- Volume of excluded field orders.¹³⁵

In 2024, Xcel reported the total number of field order was 1,838 and the 2024 total was significantly less than both the 2022 and 2023 numbers for this same metric (9,379 and 7,824 respectively). The average response time for those orders increased from 3.54 days in 2022 to 7.05 days in 2023 and 8.7 days in 2024.¹³⁶

The Department acknowledges Xcel fulfilled the requirements in the Order listed above.

F.2. Order Accepting Annual Safety, Reliability, and Service Quality Reports for 2003, . . . and Clarifying Requirements

The Commission clarified its Order accepting the Company's 2004 SRSQ at Order Point 6 that Xcel shall include, on a going forward basis, data regarding credits calls, but not calls from C&I customers in its calculation of call center response times.¹³⁷

¹³³ 2019 SRSQ Order at Order Point 16.

¹³⁴ Order, November 30, 2010, Docket Nos. E,G002/M-09-224 and G002/CI-08-871. (eDockets) [201011-56955-02](#) at Order Point 2.

¹³⁵ *Ibid.*

¹³⁶ Petition at Attachment D.

¹³⁷ Order Accepting Annual Safety, Reliability and Service Quality Reports, Approving 2004 Reliability Standards, Granting Variances and Clarifying Requirements, PUC Order, November 3, 2004, Docket No. E002/M-04-511 (eDockets) [1932736](#) at Order Point 6.

Analysts assigned: John Kundert, Rachel Wiedewitsch

The Company complied with this Commission Order in the calculation included in Attachment F of the Report.

The Department acknowledges that Xcel fulfilled the requirements in the Order listed above.

F.3. Order Approving the Elimination of the Standalone Annual Summary of Customer Complaints docket (YY-13) and Requiring Utilities to include complaint data from Minnesota Rules 7820.0500 in their Annual Service Quality Reports with data filed as part of Minnesota Rules 7826.2000. (Docket No. E002/M-22-162), issued January 18, 2023

In its 2021 SRSQ Order, the Commission included the following:

2. Required utilities to include customer complaint data from Minnesota Rules 7820.0500 in their Annual Service Quality reports with data filed as part of Minnesota Rules 7826.2000.¹³⁸

Xcel referenced this Order and noted that it had included the required information in the Petition.¹³⁹ The Department reviewed that information, and concludes the Company is in compliance with the requirements of the Commission's Order.

F.4. Commission's 2020 SRSQ Order – Electronic Customer service contacts

This Order included several reporting requirements related to this topic.¹⁴⁰ The Department discusses them in order.

At Order Points 2, 3, and 4, the Commission required certain new information be filed regarding electronic utility-customer interactions beginning with the April 2023 report:

2. Required the Company to provide:
 - a) Percentage uptime to the second decimal;
 - i. General website
 - ii. Payment services
 - iii. Outage map and/or outage information page
 - b) Error rate percentage to the third decimal;
 - i. Payment services.
3. Provide the percentage uptime and error rate percentage information in their annual reports for the next three-year reporting cycles to build baselines for web-based service metrics.

¹³⁸ 2021 SRSQ Order at Order Point 2.

¹³⁹ Petition at Attachment G.

¹⁴⁰ 2020 SRSQ Order at Order Points 2, 3 and 4.

Analysts assigned: John Kundert, Rachel Wiedewitsch

4. Required the Company to continue to provide the information on electronic utility-customer interaction such that baseline data are collected:
 - a. Yearly total number of website visits;
 - b. Yearly total number of logins via electronic customer communication platforms;
 - c. Yearly total number of emails or other customer service electronic communications received; and
 - d. Categorization of email subject, and electronic customer service communications by subject, including categories for communications related to assistance programs and disconnection as part of reporting under Minn. R. 7826. 1700.

The Company provided monthly page views of its website, Facebook, MyAccount, as well as the number of mobile app installations. Table 19 provides the four-year average for each category from 2020-2023 and the 2024 results.¹⁴¹

The Department notes the number of website visits in 2024 was higher than the 2023 results and the four-year average while the 2024 results for logins via electronic customer communications platforms and emails or other customer service electronic communications received were both below the 2023 results as well as their respective four-year averages

Table 19: Xcel Page Views, and App Installations and Emails 2020-2024

Line No.	Year	Website Visits	MyAccount, Mobile App	Emails or Other	Total
1.	2020	12,981,427	19,432,738	235,210	32,649,375
2.	2021	11,098,531	14,626,676	121,679	25,846,886
3.	2022	10,669,980	14,458,009	83,952	25,211,941
4.	2023	10,087,594	13,810,662	101,131	23,999,387
5.	4-yr Average	11,209,383	15,582,021	135,493	26,926,897
6.	2024	11,890,711	13,585,218	104,006	25,496,278
7.	4-yr Variance	6%	-13%	-23%	-5%
8.	1-yr Variance	18%	-2%	3%	6%

Source: Minnesota Department of Commerce

The Department acknowledges Xcel fulfilled the requirements in the Order listed above.

The Department notes this reporting requirement included in Order Point 3 of the 2020 SRSQ Order. From a procedural perspective, Xcel was only required to provide this information for the next three

¹⁴¹ Petition at 18 through 20.

reporting cycles (2022, 2023 and 2024). Hence, this reporting requirement lapses in the 2025 reporting cycle unless the Commission acts.

Considering that limit, The Department recommends the Commission require Xcel to continue reporting on the current reporting requirements in future years to maintain transparency on performance.

F.5. Remote Disconnection variance order reporting requirements

Xcel's deployment of AMI is the driver for this discussion. AMI provides the Company with the capacity to remotely disconnect and reconnect a customer's electric service. Minn. Rule 7820.2500 only allows an electric customer to be disconnected "in conjunction with a personal visit." The Company's use of remote disconnection and reconnection would result in Xcel not being in compliance with the Rule if it were to simply proceed to make those changes to its disconnection policies and procedures. Hence, the Company requested a variance to that Rule in Docket No. E002/M-22-233.¹⁴²

The Commission approved a one-year variance to Minn. R. 7820.2500 for customers subscribed to Residential Service, Residential Time-of-Day Service, Small General Service, or Small General Time of Day Service in March 2023.¹⁴³ The Commission also approved the continuation of the variance with some minor changes in the 2023 SRSQ Order.¹⁴⁴

The Remote Reconnection Variance Order required the Company to 1) revise certain procedure related for customers with medical needs that require utility service; 2) report on 12 evaluation metrics of interest in the Remote Reconnection Variance proceeding in the Company's 2023, 2024 and 2025 Service Quality Reports; and 3) to meet with stakeholders prior with stakeholders to discuss the 12-evaluation metrics reporting requirements prior to filing.¹⁴⁵

F.5.1. ORDERS POINT 4, 5 AND 6 – REMOTE RECONNECTION VARIANCE ORDER

Order point 4 required Xcel to make revisions to the Company's Medically Necessary Equipment & Emergency form, 2) provide a 30 day time requirement Xcel has to follow regarding the amount of time a customer has to renew or initiate a request for enrollment in the Company's medical registry, 3) meet with certain entities about the medical registry, 4) send additional information to all customers once a year and 6) submit a compliance form with these requirements.

The Commission ordered revisions relevant to the Medical Necessary Equipment and Emergency Certification program's application form. The included:

1. Revise the Company's Medically Necessary Equipment & Emergency Certification Form to include nurse practitioners and physician assistants among the medical personnel

¹⁴² Remote Reconnection Variance Petition at 17

¹⁴³ Remote Reconnection Variance Order at Order Point 4.

¹⁴⁴ 2023 SRSQ Order at Order Point 16.

¹⁴⁵ Remote Reconnection Variance Order at Order Points 4, 5 and 6.

who can provide written certification that failure to reconnect or continue service would impair or threaten the health or safety of a resident of the customer's household.

2. Remove the Medical Verification check boxes from the form and replace them with broad language that recognizes that cognitive impairments may qualify as a medical emergency under the statute.
3. Add an email address to the form to allow qualified medical professionals to email a completed and scanned form to the Company's Personal Account Representative team to be entered into Xcel Energy's system.

The Remote Reconnection Variance Order's three remaining requirements included:

4. Provide 30 calendar days for a customer – whether a new or renewing customer – to obtain written certification that failure to connect or continue service would impair or threaten the health or safety of a resident of the customer's household.
5. Meet with or present information about the medical registry to organizations identified by AARP, OAG, and the Energy CENTS Coalition.
6. Send additional information about Xcel Energy's medical registry to all Minnesota customers once a year.¹⁴⁶

In Order Point 5, the Commission identified 12 evaluation metrics.¹⁴⁷ The Department notes that the Company included the relevant information on those same 12 metrics in section J of Part 1 of the 2024 SRSQ.¹⁴⁸

In Order Point 6 of the Remote Reconnection Variance Order, the Commission required Xcel to meet with stakeholders to discuss the 12-evaluation metrics listed in Order Point 5 following the submission of its 2023, 2024 and 2025 SRSQ Reports.¹⁴⁹

The Department provides its review of the Company's results for 2024 in response to the reporting requirements included in order points 5 and 6 in the following sections.

F.5.2. 2024 Summary of Disconnection and Reconnection Reporting Requirements

The following twelve reporting requirements are included in Order Point 5 of the Remote Reconnection Variance Order and are discussed in turn:

- i. Meter-related complaints for advanced metering infrastructure.

¹⁴⁶ Remote Reconnection Variance Order at Order Point 4.

¹⁴⁷ Remote Reconnection Variance Order at Order Point 5.

¹⁴⁸ Petition at 24.

¹⁴⁹ Remote Reconnection Variance Order at Order Point 6.

- ii. The percentage of customers flagged for disconnection who pay their disconnection amount in full in the current process versus after the variance has been implemented.
- iii. The number of visits required when the Company is unable to reach the customer (speaking to the customer or leaving a voicemail).
- iv. The length of time for reconnecting each customer, and the method for reconnecting the customer.
- v. Re-analysis of actual costs for disconnection/reconnection requiring in-person visits and those performed remotely.
- vi. Detailed cost information and subsequent analysis of costs as opposed to the Company's proposed language stating adjustments to costs can be following the first year of reporting.
- vii. Progress exploring texting capabilities for customer contact and progress on an automated process for reconnection.
- viii. Progress adding a direct link on its website to submit the Medically Necessary Equipment and Emergency Certification Form.
- ix. Feedback from the Department of Commerce, Energy Assistance Unit regarding remote disconnection.
- x. Compliance with all consumer protection measures ordered in this proceeding.
- xi. Detailed information on the number of customers opting out of AMI meter installation and demand-billed customers compared to customers with AMI meters installed.
- xii. A proposal for using the capacity of its advanced metering infrastructures to restore electric service to customers during periods of extreme heat.

F.5.2.1. Meter-related complaints for advanced metering infrastructure

The Company states it received 16 meter complaints relating to AMI opt-out in 2024. None of the complaints, the Company states, were related to customer concerns of disconnection or credit-related activity.¹⁵⁰

F.5.2.2. The percentage of customers flagged for disconnection who pay their disconnection amount in full in the current process versus after the variance has been implemented.

The Company states that a total of 2,757 customers eligible for disconnection in 2024 paid their account in full for a total of 0.7 percent of customers eligible for disconnection.¹⁵¹ Xcel noted a total of 375,049 customers were eligible for disconnection in 2024. However, this number also includes those who were eligible for disconnection multiple times within the year.¹⁵²

¹⁵⁰ Part 1 of 3: Safety and Service Quality for 2024, at 22.

¹⁵¹ *Ibid.*

¹⁵² *Ibid.*

F.5.2.3. The number of field visits required when the Company is unable to reach customers (speaking to the customer or leaving a voicemail)

The Company states,

Of the total of 47,658 disconnection orders placed, we were able to make a final contact via a phone call or voicemail with the customer 93 percent of the time, or a total of 44,349 contacts. The Company was unable to reach the customer through a final call or voicemail seven percent of the time, or a total of 3,309 contacts.¹⁵³

Xcel also noted that in instances where no phone contact was made, customers were placed in a queue to be manually disconnected.¹⁵⁴ An account's position in the queue is determined by a dollar value. The Company also states that if an account where no phone contact was made has a remote-capable meter, a field employee attempts to make contact at the door before remotely disconnecting the meter.¹⁵⁵

The Company's process to contact a past due customer includes multiple channels including phone calls, emails, U. S. Mail, a past due notice on their bill(s), and potentially a door knock.¹⁵⁶ The Company states:

Our AMI remote disconnect/reconnect process requires that in lieu of the field visit, we establish successful contact with the customer via an additional call or voicemail, and per Order Point 19 in the Commission's January 13, 2025 Order in Docket No. E002/M-24-27, the Company must attempt to contact a customer via an additional electronic method, if permission from the customer has been received. If we cannot establish this contact, the Company is required to perform a field visit prior to disconnection.¹⁵⁷

F.5.2.4. The length of time for reconnecting each customer, and the method for reconnecting the customer

Xcel provided a table that included customer reconnection times for both remote and manual reconnection protocols.¹⁵⁸ The Department rearranged the information in those two tables in Tables 20.a through 20.c.

¹⁵³ *Id.*, at 23

¹⁵⁴ *Ibid.*

¹⁵⁵ Part 1 of 3: Safety and Service Quality for 2024, at 23.

¹⁵⁶ *Ibid.*

¹⁵⁷ *Ibid.*

¹⁵⁸ Petition at 24.

Table 20.a: Average Time by Class for Reconnection for Remote and Manual Protocols - 2024 Results (in average hours)¹⁵⁹

Protocol	Residential	Commercial	All
Remote	0.46	0.49	0.51
Manual	49.99	42.47	48.99
Difference	49.53	41.98	48.48
% Diff.	99%	99%	99%

**Source: Minnesota Department of Commerce*

Remote reconnections for residential customers took 28 minutes on average while manual remote reconnections required 2,999 minutes on average. The results for the commercial class were similar, (29 and 2,548 minutes) while the results for “all” class were 31 minutes and 2,939 minutes. The average time it took to reconnect a customer from either customer class was 99% lower than performing a manual reconnection.

Table 20.b: Longest Time by Class for Reconnection for Remote and Manual Protocols - 2024 Results (in average hours)

Protocol	Residential	Commercial	All	Other
Remote	829.11	120.23	829.11	NA
Manual	2522.24	434.73	2522.24	90.78
Difference	1693.13	314.5	1693.13	NA
% Diff.	67%	72%	67%	NA

**Source: Minnesota Department of Commerce*

The longest remote reconnection for a residential customer took 829. 11 hours while the longest manual reconnection for a commercial customer required 2,522. 24 hours. The results for the “all” class were identical to those for the residential customer class. The longest time it took to reconnect a residential customer remotely was 67% lower than longest time it took to reconnect a residential customer manually. The “all” class results were the same as the residential class. The results for the commercial class were better than the residential class.

Table 19. c: Shortest Time by Class for Reconnection for Remote and Manual Protocols - 2024 Results (in average hours)

	Residential	Commercial	All	Other
Remote	0.00	0.02	0.00	NA
Manual	0.84	1.27	0.84	1.27
Difference	0.84	1.25	0.84	NA
% Diff.	100%	98%	100%	NA

**Source: Minnesota Department of Commerce*

¹⁵⁹ Petition at 28.

The shortest remote reconnection for a residential customer took zero hours while the shortest manual reconnection for a residential customer required 0.84 hours. The results for the “all” class were identical to those for the residential customer class. The shortest time it took to reconnect a residential customer remotely was 100% lower than longest time it took to reconnect a residential customer manually. The “all” class results were the same as the residential class. The results for the commercial class only differed slightly from those of the residential class.

F.5.2.5. Re-analysis of actual costs for disconnection/reconnection requiring in-person visits and those performed remotely.

Xcel provided a table that compared remote and physical disconnect/reconnect costs for 2024 in the filing.¹⁶⁰ In 2024 the average cost for a remote disconnect/reconnect was \$19.96 and the average cost of a physical disconnection was \$158.31.¹⁶¹ In 2024 the average cost of a remote disconnect/reconnect was only 13% of the average cost of a physical disconnect/reconnect.¹⁶² It was much more efficient economically to reconnect a customer remotely than it is to reconnect that same customer physically in 2024.

F.5.2.6. Detailed cost information and subsequent analysis of costs as opposed to the Company’s proposed language stating adjustment to costs can be made following the first year of reporting.

The Company provided complete and detailed cost information that was identical to that provided for 2024.¹⁶³ The average cost of a remote disconnect/reconnect in 2022 and 2023 was \$13.80 and \$21.15.¹⁶⁴ The average cost of a remote disconnect/reconnect was \$99.87 and \$171.36 respectively. Hence, in 2022 and 2023, the average cost of a remote disconnect/reconnect was only 14 percent of the average cost of a physical disconnect/reconnect in 2022 and 12 percent in 2023.¹⁶⁵

F.5.2.7. Progress exploring texting capabilities for customer contact and progress on an automated process for reconnection.

The Company states it is working on an option that would allow customers the ability to text for reconnection, but a firm plan and delivery date have yet to be determined.¹⁶⁶

¹⁶⁰ Petition at 25 Table 10.

¹⁶¹ Petition at Attachment H.

¹⁶² 2024 Average Cost of Remote Reconnection (\$19.96)/ 2024 Average Cost of Physical Reconnection (\$158.31) = 13%.

¹⁶³ Petition at p. 25 Table 10.

¹⁶⁴ *Ibid.*

¹⁶⁵ In 2022, \$13.80/\$99.87 = 13.8% (14%). In 2023, \$21.15/\$171.36 = 12.3% (12%).

¹⁶⁶ Petition at 25-26. *Ibid.*

The Department requests Xcel, in reply comments, provide an update on the plan and timeline for implementing texting capabilities for reconnection and customer contact.

F.5.2.8. Progress adding a direct link on its website to submit the Medically Necessary Equipment and Emergency Certification Form

The Company states that due to the complexity surrounding the number of areas on the Company's website that the Medically Necessary Equipment & Emergency Certification form touches, the Company has determined that there is not a cost-reasonable option to employ a direct-submit function for the form.¹⁶⁷ However, Xcel does state the form may now be emailed or faxed into the Personal Accounts Department.¹⁶⁸

The Department requests Xcel, in reply comments, expand on its explanation about the complexities of direct submission of its Medically Necessary Equipment & Emergency Certification form. Specifically, is the Company proposing that it simply will not or cannot add a direct link currently and is requesting a change to this reporting requirement? In the alternative, is there a cost-effective alternative for a direct link to its website?

F.5.2.9. Feedback from the Department of Commerce, Energy Assistance Unit regarding remote disconnection

Staff from the Department's Office of Regulatory Affairs contacted the staff from the Energy Assistance (now Affordability Program) area prior to filing. The Energy Affordability staff contacted did not have any feedback regarding remote disconnection at this time.

¹⁶⁷ Petition at 26.

¹⁶⁸ *Ibid.*

F.5.2.10. Compliance with all consumer protection measures order in this proceeding.

Xcel noted that it filed the required consumer protection filing compliance filing on April 20, 2023. The Company did not repeat that information in the Petition.

F.5.2.11. Detailed information on the number of customers opting out of AMI meter installation and demand-billed customers compared to customers with AMI meters installed.

Xcel provided a table which included the number of AMI opt outs and the number of AMI meters installed.¹⁶⁹ Approximately 0.46% of its customers chose to opt out of receiving an AMI meter in 2024.

F.5.2.12. A proposal for using the capacity of its advanced metering infrastructure to restore electric service to customers during periods of extreme heat.

Xcel filed a plan consistent with this reporting requirement.¹⁷⁰ This plan/program was noticed by the Commission and is being reviewed on a separate track within this docket.

The Department's review of this section of the filing concluded the Company has complied with the Commission's reporting requirement except for 1) the discussion related to the progress the Company has made adding a direct link on its website to submit the Medically Necessary Equipment and Emergency Certification Form, and 2) the Company's plan to implement texting capabilities, as noted in the relevant subsections above.

F.5.3. Meeting with stakeholders to discuss evaluation metrics

Order Point 6 required Xcel to meet with stakeholders to discuss/evaluate the metric requirements results from the prior year.

The Company stated it intent to hold that required meeting.¹⁷¹ The meeting did take place on and Department staff participated. Xcel filed the presentation from that meeting on May 14, 2025.¹⁷²

The Department concludes the Company has complied with the Commission's reporting requirements included in Order Points 5 and 6 of the Remote Reconnection Variance Order in 2024.

¹⁶⁹ Petition at 27 Table 11.

¹⁷⁰ Petition at 27.

¹⁷¹ Petition at 28.

¹⁷² *In the Matter of Xcel Energy's 2024 Safety, Reliability and Service Quality Standards Report*, Workshop Presentation Materials, May 14, 2025, Docket No. E002/M-25-27 (eDockets) [20255-218917-01](#).

G. *PART 3 OF 3 OF XCEL'S PETITION - ORDER POINTS THAT REPRESENT NEW REPORTING REQUIREMENTS FROM THE 2023 SRSQ ORDER.*¹⁷³

The Department discusses each of the order points (as the points relate to Xcel's filing) below.

G.1. *Order Point 6 - 2024 Reliability goals*

Xcel's 2024 statewide Reliability Standard is set at the IEEE benchmarking second Quartile for large utilities. Xcel's Southeast and Northwest work center reliability standards are set at the IEEE benchmarking second quartile for medium utilities. Xcel's Metro East and Metro West work center reliability center standards are set at the IEEE benchmarking second quartile for large utilities.

As discussed earlier, the Department will provide a recommendation on the Company's 2024 Reliability Report and its 2025 reliability goals after reviewing Xcel's Supplemental filing on the IEEE 2024 benchmarking data that the Company will file later in 2025.

G.2. *Order Point 7 – 2024 IEEE reliability benchmarks*

Xcel must file a supplement to its 2024 safety, reliability, and service quality report 30 days after IEEE publishes the 2024 benchmarking results, with an explanation for any standards the utility did not meet.

Xcel stated in the Petition that it will supplement its petition, anticipated in the fall of 2025, with the results of IEEE's 2024 performance year benchmarking results.¹⁷⁴

G.3. *Order Point 14 – Service extension timelines*

Xcel must include an analysis and summary data based on the data points below for 2024 with its next safety, reliability, and service quality report due April 1, 2025 report to better determine if there are areas for improvement in shortening service timelines. 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 of meter installation*

¹⁷³ *In the Matter of Northern States Power Company's Annual Report on Safety, Reliability, and Service Quality for 2024; and Petition for Approval of Electric Reliability 2025*, Petition, (Part 3 of 3: Order Compliance), April 1, 2025, Docket No. E002/M-25-27, (eDockets) [20254-217138-05](#), (hereinafter "Part 3: Order Compliance") at 91.

¹⁷⁴ Petition at 48.

- *Date of service connection*

The Department's review suggests that Xcel did comply with this reporting requirement . The Company provided a summary analysis in the Petition and the data used for that analysis in an attachment.¹⁷⁵

The Department concludes Xcel has complied with this reporting requirement.

G.4. Order Point 15 -Service extension data

Xcel must report service extension timelines by work center in future safety, reliability, and service quality reports.

The Department notes that the Company provided the required information in the Petition.¹⁷⁶

The Department concludes Xcel has complied with this reporting requirement.

G.5. Order Points 16, 17 and 18 – Remote reconnection variance

Order Point No. 16. The Commission grants Xcel's request for a temporary extension of the variances to Minn. Rule 7820.2500 regarding AMI disconnection as approved in the Commission's March 22, 2023, order in Docket No. E002/M-22-233.

Order Point No. 17. The Commission extends the variance until the Commission issues a decision on the variance request as presented in the 2024 safety, reliability, and service quality report.

Order Point No. 18. The extended variance is retroactively effective starting from the expiration of the previous variance on April 22, 2024.

The Department notes the Commission first approved a one-year variance to Minn. R. 7820.2500 for certain customer classes in Docket No. E002/M-22-233.¹⁷⁷ That variance became effective 30 days after the date of the order, April 22, 2023.

The three changes to the variance approved in the 2023 SRSQ Order included the information in Order Points 16, 17 and 18.¹⁷⁸

The remote reconnect variance discussed in Order Point 16 is only effective until the Commission decides on the Company's remote reconnect variance requests in this docket. Hence, Xcel's request to

¹⁷⁵ Petition at 9 and Attachments R and S.

¹⁷⁶ Petition at 9-12.

¹⁷⁷ Remote Reconnection Variance Order at Order Point 5.

¹⁷⁸ 2023 SRSQ Order.

extend the remote reconnect variance for another year is in this docket. The time-period discussed in Order Point 18 is no longer relevant.

The Department concludes that the Company complied with the reporting requirements Order Points 16, 17 and 18 of the 2023 SRSQ Order.

G.6. Order Point 19 -Remote disconnection threshold

The Commission increases the existing threshold of final contact for disconnection by requiring Xcel 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 states it has been providing customers with multiple points of contact for pending disconnections for several years but has focused the last few months on adding in the additional electronic, final contact methods as required in Order Point 19.¹⁷⁹ The Company states it will begin providing this additional point of contact in April 2025.¹⁸⁰

The Department requests Xcel, in reply comments, provide an update on the status of adding the additional electronic, final contact method.

The Department will review this information and make a recommendation in a subsequent set of comments if it is sufficient.

G.7. Order Point 21 – Affordability program outreach

Xcel must perform additional outreach throughout its service territory with the goal of increasing participation in affordability programs that reduce bad debt.

The Company states that in 2024, the Personal Accounts organization that manages its energy assistance and affordability programs completed 34 outreach campaigns that included automated dials, emails, manual dials, mailers, bill inserts, social media, and in-person events.¹⁸¹ The Company also states it increased training for its contact center teams to reinforce the need to provide additional energy assistance information to customers calling in for help.¹⁸²

The Department requests Xcel, in reply comments, compare the number of outreach campaigns completed in 2024 to the number of outreach campaigns completed in prior years. The Department also requests Xcel, in reply comments, summarize any lessons learned from the outreach campaigns it

¹⁷⁹ Part 3 of 3: Order Compliance at 93.

¹⁸⁰ *Ibid.*

¹⁸¹ *Ibid.*

¹⁸² *Ibid.*

completed in 2024 (i.e. which mode was most effective; what were the outcomes of the campaigns; was there an increase in energy assistance enrollments following the campaigns; etc.).

The Department will review this information and make a recommendation in a subsequent set of comments if it is sufficient.

G.8. Order Point 22 – Publication of certain policies

Xcel must 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 states it posted the “Minnesota Disconnection Process” document along with the language proposed in Energy Cents Coalition and the Citizen’s Utility Board of Minnesota’s (CUB) September 12, 2024, comment, on its website.¹⁸³

The Department concludes that the Company has complied with this Order Point.

G.9. Order Point 23 – Disconnection individualized payments

Xcel must 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.

On January 31, 2025, Xcel filed its “Minnesota Disconnection Process” document that details its disconnection policies and practices.¹⁸⁴ After feedback from CUB, Xcel clarified in a corrected version of the document filed on March 3, 2025.¹⁸⁵ In that document, the Company notes it offers individualized payment arrangements, including down payments lower than those reduced amounts agreed to in Order Point 26, on a case-by-case basis in consideration of both household financial circumstances and extenuating circumstances.¹⁸⁶

The Department concludes that the Company has complied with Order Point 23.

¹⁸³ Part 3 of 3: Order Compliance at 93-94.

¹⁸⁴ Part 3 of 3: Order Compliance at 94.

¹⁸⁵ *Ibid.*

¹⁸⁶ *Ibid.*

G.10. Order Point 24 -extreme heat reconnection program

Xcel must propose a plan, in its 2024 safety, reliability, and service quality report due April 1, 2025, to restore power for involuntarily disconnected customers with AMI during a heat advisory or excessive heat warning, issued by the National Weather Service and to inform the Commission's consumer affairs office and customers of its plans to restore power for involuntarily disconnected customers with AMI during extreme heat events.

This order point was addressed with a separate notice and comment period, filed April 7, 2025,¹⁸⁷ in which the Department has commented.

The Department concludes Xcel has complied with Order Point 24.

G.11. Order Point 25 – Requesting medical protections

Xcel must conduct additional outreach and provide customers with information about how to request medical protections if they are particularly vulnerable to poor air quality.

The Company states that it is currently adding medical certification education information to all of its energy assistance campaigns and training its customer service representatives on available protections and assistance so the information can be shared with customers as they call in for assistance.¹⁸⁸ The Company states it is also pursuing ways to provide information on available protections to customers at in-person events and through the team in the Personal Accounts department.¹⁸⁹ The Company directs customers to its Medically Necessary Equipment and Emergency Certification Form¹⁹⁰ as a mechanism for customers to provide medical certification of their vulnerability and be provided protection from disconnection.¹⁹¹

Although Xcel states that it is currently adding information on its medical protections to its campaigns on energy assistance, the process is reactive. For example, when a customer calls for help, a customer service representative will soon be better prepared to provide the information. The Department is concerned that the reactive process will only capture those already in crisis. In its comments responding to the April 7, 2025 Notice¹⁹² addressing protections in instances of poor air quality and extreme heat, the Department recommended “the Commission require Xcel to submit a compliance

¹⁸⁷ *In the Matter of Northern States Power d/b/a Xcel Energy – Electric's 2024 Annual Safety, Reliability, and Service Quality Report*, Notice of Comment Period, April 7, 2025, Docket No. E002/M-25-27, (eDockets) [20254-217296-01](#) (hereinafter: “Heat and AQI Notice”).

¹⁸⁸ Part 3 of 3: Order Compliance at 102.

¹⁸⁹ *Ibid.*

¹⁹⁰ [Medically Necessary Equipment and Emergency Certification Form](#)

¹⁹¹ *Ibid.*

¹⁹² Heat and AQI Notice

filing within 60 days of the publication of the Order in this docket detailing its communication and outreach strategies for informing customers of extreme heat and air quality protections including the availability and protections of its 'Medically Necessary Equipment & Emergency Certification Form.'¹⁹³ Parallel to this recommendation, the Department concludes that proactive sharing of the Company's medical protections would benefit the most customers who would qualify for the protection but may have not called to inquire.

The Department requests Xcel, in replies, propose a plan to proactively provide information regarding medical protections (before a customer may be facing disconnection or calling for help).

The Department will review this information and make a recommendation in a subsequent set of comments if it is sufficient.

G.12. Order Point 26 – Individualized payment arrangements

Xcel must reduce its down payment requirements and modify its disconnection and payment agreement practices to include consideration of individual household financial circumstances. Xcel must offer the down payment percentage amounts as shown in the table above but may offer lower down payment plans as warranted by consideration of individual household circumstances.

Xcel states that it began meeting this requirement in December of 2024 when staff of the Personal Accounts organization and customer service personnel received training on the down payment schedule agreed to with CUB and Energy CENTS in Docket No. E002/M-24-27.¹⁹⁴ The Company states:

The wording of this Order Point instructs the Company to modify its disconnection and payment agreement practices to include consideration of individual household financial circumstances. While the Order suggests the need for modification, the Company affirms that it historically considered individual household financial circumstances, as well as extenuating circumstances, in negotiating payment arrangements with customers, as required by Minn. Stat. § 216B.096, Subd. 5. We have done so in the past and will continue to do so, and, therefore, are in compliance with the Commission's directive on this point.¹⁹⁵

The Company provided the following table. Xcel states the reduced down payments shown in Table 27 below were offered to customers beginning January 2025.¹⁹⁶

¹⁹³ Department Initial Comments at 6.

¹⁹⁴ Part 3 of 3: Order Compliance at 103

¹⁹⁵ Part 3 of 3: Order Compliance at 103.

¹⁹⁶ *Id.* at 104.

Table 27
Graduated Down Payment Structure for Payment Plans, as adopted in Docket No. E002/M-24-27

Payment Arrangement Offered	1 st	2 nd	3 rd	4 th	5 th	6 th
Normal Payment Agreements	10% down	25% down	35% down	50% down	50% down	50% down
Extenuating Circumstances Payment Agreement	10% down	15% down	25% down	40% down	50% down	50% down

Xcel also noted in its discussion on this change to the Company’s disconnection policy that “allowing customers to set arrangements for lower down payments may lead to higher arrears balances and a higher number of broken payment arrangements.”¹⁹⁷

In DOC information request #11, the Department asked if the Company had collected information on this potential outcome since the change was implemented in early 2025. Xcel responded that it would need 12 months of actuals as payment plan arrangements are set up for a 12-month period.¹⁹⁸

The Department concludes Xcel has complied with this reporting requirement.

G.13. Order Point 27 – Average down-payment reporting

Xcel must detail in its annual safety, reliability, and service quality 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.

The Company provided the average down-payment received from customers information in the filing.¹⁹⁹ Xcel also noted that in its response to Order Point 26 the Company referenced its agreement to modify the training for Personal Accounts staff such that the reduced down-payment schedule included in Table 27 of Part 3 of the Petition was offered beginning in January 2025.

The Department concludes that Xcel has complied with this reporting requirement.

¹⁹⁷ Petition at 8.

¹⁹⁸ Attachment DOC-6.

¹⁹⁹ Petition at 105-106.

G.14. Order Point 28 – Disconnection notice threshold

Xcel must not send disconnection notices until a customer's balance reaches \$180 past due.

The Company states it met this requirement by formalizing a preexisting practice. The “Minnesota Disconnection Process” document filed in Docket Nos. E002/M-24-27 and E,G002/PR-24-02 and posted to the Xcel Energy website notes that:

Payment thresholds. Disconnect notices will only be mailed out once a customer's past due balance reaches \$180.²⁰⁰

The Department concludes that the Company has complied with Order Point 28 by formalizing its existing practice.

G.15. Order Point 29 – Past due minimum balance for disconnection

Xcel must not disconnect customers with a past due balance below \$300.

Xcel states that it met this requirement by formalizing another preexisting practice. The “Minnesota Disconnection Process” document filed in Docket Nos. E002/M-24-27 and E,G002/PR-24-02 and posted to the Xcel Energy website notes that:

Payment thresholds. ... Customers are not subject to disconnection until the balance reaches at least \$300.²⁰¹

The Department concludes that the Company has complied with Order Point 29 by formalizing its existing practice.

G.16. Order Point 30 – Disconnection grace period

Xcel must wait at least 10 days after sending a disconnection notice before disconnecting a customer.

Xcel states that it met this requirement by formalizing another preexisting practice. The “Minnesota Disconnection Process” document filed in Docket Nos. E002/M-24-27 105 and E,G002/PR-24-02 and posted to the Xcel Energy website notes that:

Notice. The disconnection/shut-off notice due date is ten business days after the Disconnection Warning Statement during **both Non-Cold**

²⁰⁰ Part 3 of 3: Order Compliance at 104

²⁰¹ *Ibid.*

Weather Rule (CWR) (May 1 – September 30) and Cold Weather Rule (CWR) (October 1 - April 30).²⁰²

The Department concludes that the Company has complied with Order Point 30 by formalizing its existing practice.

G.17. Order Point 31 – Policy evaluations

Xcel must evaluate implementing the following policies and to file the evaluation by April 1, 2025 in its 2024 safety, reliability, and service quality report.

- *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.*

Xcel states that if the reconnection fee were changed from \$13.50 to \$0, the Company would remove \$450,000 per year from its rate case and would need to raise base rates by that same amount to cover the costs of the reconnection of service.²⁰³ The Company states the annual bill impact to a typical residential customer would be approximately \$0.40.²⁰⁴

- *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. The proposal should include year over year targets designed to increase the number of people receiving energy efficiency measures.*

The Company states:

As required by Minnesota Rule 7690.0550, the Company reports on the Income Qualified segment's participation and performance in our annual Status Reports. For 2024, this report will be filed April 1, 2025 in Docket No. E,G002/CIP-23-92. This reporting includes an estimate of anticipated and actual Income Qualified residential customer participation levels for each program, and the planned and actual Income Qualified spending and energy savings for each program. These are, in effect, "year over year targets" as discussed in Order Point 31.b., and the Company believes our Energy Conservation and Optimization (ECO) Triennial Plans and annual

²⁰² *Id.* at 105.

²⁰³ Part 3 of 3: Order Compliance at 107.

²⁰⁴ *Ibid.*

status reports remain the most appropriate place for tracking progress on those targets.²⁰⁵

The Department concludes that the Company did not include “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,” in its response to this order point. Although the Company listed its current programs within the Income Qualified segment, including Affordable Efficient New Home Construction, Home Energy Savings Program, Low Income Home Energy Squad, and others, and indicated that the Income Qualified segment is a focus of the Company, it did not propose how it intended to increase the number of customers receiving aid from the mentioned programs.²⁰⁶

The Department recommends Xcel, in reply comments, file “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,” as originally ordered at Order Point 31.b.

- *A more robust hot-weather rule to prevent disconnections in months with the highest cooling energy burden.*

The Company states that it has reviewed temperature data and has determined that the two months with the highest temperatures annually are July and August.²⁰⁷ By suspending disconnections in July and August and the seven months under the current Cold Weather Rule (CWR), the Company would only perform credit disconnections in the months of May, June and September.²⁰⁸ The Company is concerned that customers would be less likely to contact Xcel and work to pay down arrears balances if credit disconnections are not an option. The Company discusses the disconnection moratorium due to the pandemic stating:

As was seen during the 18-month disconnection moratorium due to the pandemic, customers were less likely to engage with the Company to make efforts to pay down arrears balances when credit disconnection was not an option and subsequently, arrears balances grew by 50 percent over pre-pandemic levels.²⁰⁹

The Company estimates that the increase in bad debt from suspending in the months of July and August would be at or above an additional one million dollars annually not including the impact of a condensed disconnection season on complaints, call forecasts and staffing, or higher rates of

²⁰⁵ Id. at 108.

²⁰⁶ Part 3 of 3: Order Compliance at 107-110

²⁰⁷ Id. at 110

²⁰⁸ *Ibid.*

²⁰⁹ *Ibid.*

disconnections due to higher arrears.²¹⁰ The Company also expresses concern with the impact that the additional months of disconnection suspension may have on the increased need for energy assistance funding and the potential for more customers to experience hardship.²¹¹

The Department requests Xcel, in reply comments, explain its concern regarding the impact the additional months of disconnection suspension may have on the increased need for energy assistance funding and the potential for more customers to experience hardship.

- *Creating an off-season LIHEAP program to help income-qualified residents clear their arrears by self-attesting to their income level.*

The Company states that this requirement has been met by the completion of Order Point 33, under which the Company has filed supplemental direct testimony proposing a new program, funded with late payment charges, to help income-qualified residents clear their arrears and allowing for self-attestation of income levels.²¹² The Company states that its proposed program would be available year-round, not only during the LIHEAP off-season, but would particularly help customers clear arrears during the off-season when they are not able to enroll in LIHEAP and are more likely to experience a service disconnection due to non-payment of past due amounts.²¹³

The Department will review the additional information requested from Xcel in reply comments regarding the projects discussed and make a recommendation in a subsequent set of comments if it is sufficient.

G.18. Order Point 32 – High air quality index reconnection program

Xcel must propose a plan, as part of its with its 2024 safety, reliability, and service quality report due on April 1, 2025, to restore power for involuntarily disconnected customers with AMI when high air quality index alerts have been issued.

This order point was addressed with a separate notice and comment period, filed April 7, 2025,²¹⁴ in which the Department has commented.

The Department concludes the Company has complied with this reporting requirement.

²¹⁰ *Ibid.*

²¹¹ *Ibid.*

²¹² Part 3 of 3: Order Compliance at 110-111

²¹³ *Ibid.*

²¹⁴ *In the Matter of Northern States Power d/b/a Xcel Energy – Electric’s 2024 Annual Safety, Reliability, and Service Quality Report*, Notice of Comment Period, April 7, 2025, Docket No. E002/M-25-27, (eDockets) [20254-217296-01](#) (hereinafter, Heat and AQI Notice).

G.19. Order Point 33 – Rate case testimony on Late Fees

Xcel must supplemental direct testimony to its rate case filed November 1, 2024 in Docket No. E002/GR-24-320 a program like its offering in Colorado where interest payments and fees from late bill payments are donated to low-income customer assistance programs or the elimination of late fees and interest.

Xcel filed the required supplemental testimony in its 2024 electric rate case on March 17, 2024. Nora C. Lingren sponsored that supplemental direct testimony.²¹⁵

G.20. Order Point 34 – Landlord failure to pay

Xcel must provide a discussion in its next safety, reliability, and service quality report on how it manages disconnections due to a landlord's failure to pay, consistent with the requirements in Minn. R. 7820.1400.

The company provides the following discussion of its management of disconnections due to a landlord's failure to pay:

Minn. R. 7820.1400 dictates that where a landlord-tenant relationship is known to exist, and the landlord as customer would otherwise be subject to disconnection of service, the utility may not disconnect service until after providing notice and offering the occupant the opportunity to subscribe for service in the occupant's own name. If the occupant declines to subscribe, the utility may disconnect service. The rules also dictate that a utility may not attempt to recover from a tenant, or condition service to a tenant, with the payment of any outstanding bills or other charges due upon the outstanding account of the landlord.

In properties where a known landlord-tenant relationship exists, Xcel Energy notes the account with a multi-use designation. When this designation exists, the Company posts all accessible doors with a notice of intent to disconnect for the required time frame prior to disconnection. The notice provides a number to call, and a current tenant calling that number will have the option to request service be transferred into their name.²¹⁶

The Department concludes that the Company has complied with Order Point 34 by providing the above discussion in its Petition.

²¹⁵ *In the Matter of the Application of Northern States Power Company for Authority to Increase Rates for Electric Service in Minnesota*, Supplemental Direct Testimony, March 17, 2025, Docket No. E002/GR-24-430 (eDockets) [20253-216469-04](#).

²¹⁶ Part 3 of 3: Order Compliance at 111-112.

G.21. Order Point 35 and 36 – Equity-related requirements

35. Xcel must inform affected personnel of racial disparities in electric service.

36. Xcel must file a compliance report with its annual safety, reliability, and service quality filing on which employees received the training and what information was provided.

The Company states that it already offers a training on “Microaggressions and Unconscious Bias” to all its employees, which addresses inadvertent racial and other biases and how to avoid them.²¹⁷ Xcel states that the course is designed mostly for interactions within the Company, but that it provides a good starting point toward the development of a more targeted training focused on customer interactions for its external facing employees involved in service quality.²¹⁸

Xcel has begun to develop a new training module that focuses on overcoming unintended bias in customer interactions during service interruptions.²¹⁹ The Company has the goal of developing and administering the training later this year, to be informed by ongoing work of the Third-Party Evaluator that the Company will select under Order Point 46 in this docket.²²⁰

The Department requests Xcel, in reply comments, provide an update on the progress and timeline of its goal of developing and administering a new training that focuses on overcoming unintended bias in customer interactions during service interruptions.

The Department will review this information and make a recommendation in a subsequent set of comments if it is sufficient.

G.22. Order Point 37 – Revised tariff changes

Where not otherwise noted, Xcel must file any necessary revised tariff changes within 30 days of the date of this order.

The Company filed revised tariff sheets in a compliance filing made on February 12, 2025. Xcel provided, in redline and final format, tariff sheets:²²¹

- Minnesota Electric Rate Book—MPUC No. 2. Sheet No. 11-14, Revision 1
- Minnesota Gas Rate Book—MPUC No. 2. Sheet No. 9-15, Revision 1

The Department concludes that the Company has complied with this Order Point.

²¹⁷ Part 3 of 3: Order Compliance at 113.

²¹⁸ *Ibid.*

²¹⁹ *Ibid.*

²²⁰ *Ibid.*

²²¹ Part 3 of 3: Order Compliance at 114.

G.23. Order Point 39, 40 and 41- Interactive map additions

39. Xcel must add the following data to its interactive service quality map by census block group by April 1, 2025:

- *Municipal Boundaries*
- *Premise counts by census block group*
- *Percentage of underground electric assets*
- *Percent of electric premises disconnected for 24 hours or more*
- *Average age of arrears for disconnected premises*
- *Per premises energy costs*

40. Xcel must add to its interactive service quality map the average age of homes by Census Block Group by April 1, 2025.

41. Xcel must add to its interactive service quality map the average amount of arrears for disconnected premises by April 1, 2025.

Xcel states that the Company has added six of the eight data layers to its Xcel Energy Minnesota Service Quality – Electric map. Xcel States that some of the data layers represent a “snapshot in time” that changes on an ongoing basis (e. g. the percent of electric premises disconnected, or the amount of arrears, in each Census Block Groups (“CBG”) changes daily).²²² Xcel states other data layers change more gradually (e. g. the premise counts served by the Company, or the percent of 115 underground electric assets, in each CBG) and other layers change infrequently if at all (e. g. municipal boundaries).²²³ To the extent feasible, Xcel has decided that it should align all the data layers to the same point in time.²²⁴ Xcel states that it has selected end of year 2024 to commence the current update.²²⁵ Xcel states that not all of the data was available, in the End of Year (EOY) 2024 vintage prior to filing its Report, so the Company updated the map with the available vintages and plans to update the map “in the coming weeks the Company will be updating the map to align all dataset vintages to EOY 2024.”²²⁶

Xcel states that the two data layers that have not yet been incorporated are “average age for disconnected premises” and “average amount of arrears for disconnected premises.”²²⁷ Xcel states arrears are currently tracked by customer accounts which are currently tracked by zip code not CBG. The Company states that it anticipates it can include these layers, but it will take additional time to translate the customer accounts to premises, and zip codes to CBGs.²²⁸

²²² *Ibid.*

²²³ Part 3 of 3: Order Compliance at 114-115

²²⁴ Part 3 of 3: Order Compliance at 115.

²²⁵ *Ibid.*

²²⁶ *Ibid.*

²²⁷ *Ibid.*

²²⁸ *Ibid.*

Analysts assigned: John Kundert, Rachel Wiedewitsch

The Department requests Xcel, in reply comments, provide an update on its progress updating the map to align with the EOY 2024 vintage. The Department also requests Xcel, in reply comments, provide an update on its progress to add the “average age for disconnected premises” and “average amount of arrears for disconnected premises” to its map.

The Department will review this information and make a recommendation in a subsequent set of comments if it is sufficient.

G.24. Order Point 42 – Executive secretary authority

The Commission delegates 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 safety, reliability, and service quality report and what data continues to be reported in other dockets.

Commission staff (Staff) initiated work on this Order Point on February 11, 2025 by establishing the SRSQ reporting workgroup and requesting data on affordability reporting from the Company and other parties. Staff asked the Company and other parties to provide existing dockets and Order dates where affordability program data is reported, along with a list of the data reported in each docket. The Company states it responded on March 13, 2025, by providing a comprehensive spreadsheet summarizing the relevant dockets, Order dates, and data reported in each. The Department is also participating in this workgroup and looks forward to the continued collaboration amongst stakeholders.

This order point does not include a reporting requirement for Xcel. The Department notes that it appreciates Staff’s efforts.

G.25. Order Points 38 & 44 -targeted undergrounding and reliability programs

38. Xcel must perform additional analysis as outlined in decision options below prior to developing a proposal for targeted undergrounding or enhanced vegetation management.

44. Xcel must develop its data collected on causes of CELI-12 outages to inform which causes predominantly affect CBGs currently showing increased CELI-12. Xcel must then analyze whether the primary causes emerging in census block groups with increased CELI-12 are caused by overhead assets.

Xcel states a five-year (2020-2024) non-normalized CELI-12 analysis was conducted in 27 CBGs showing increased CELI-12 as identified in the TRC Study.²²⁹ Xcel found that there were 76 vegetation-related

²²⁹ Part 3 of 3: Order Compliance at 116.

outages that accounted for 63 percent, or 3,009 of the 4,798 CELI-12 affected customers over the five-year period.²³⁰ “The five-year CELI-12 analysis highlights that vegetation interactions with overhead assets are the predominant cause of outages affecting CBGs currently showing increased CELI-12. During the five-year period, the affected CBGs had a collective 8.33 percent CELI-12 rate compared with 4.19 percent for the overall Minnesota service territory.”²³¹

Xcel also broke out three substantial contributing causes to CELI-12. The first case was a significant weather event that took place on August 14, 2020, that produced multiple tornadoes, flash flooding, and widespread wind damage.²³² The tornadoes varied in strength and caused damage to trees, buildings, and Xcel’s power lines—according to Xcel, this single weather event contributed to 40 percent of the 5-year CELI-12 for the affected CBGs.²³³

The other two cases were single events affecting a smaller subset of CBGs. The second event Xcel identified was an outage taken in 2021 for public safety and contributed to 18 percent of the 5-year CELI-12. This case was an intentional outage that was made as a safety precaution following third-party contractor damage to a CenterPoint Energy gas line in the area.²³⁴ The third event Xcel identified was an outage due to vandalism—a car fire that spread to a pole that burned a tie switch and feeder cable during the significant civil unrest on May 29, 2020.²³⁵

Xcel provides the following chart to illustrate the predominate causes of outages in CBGs currently showing increased CELI-12, using non-normalized 2020–2024 data:

²³⁰ *Id.* at 117

²³¹ *Id.* at 118

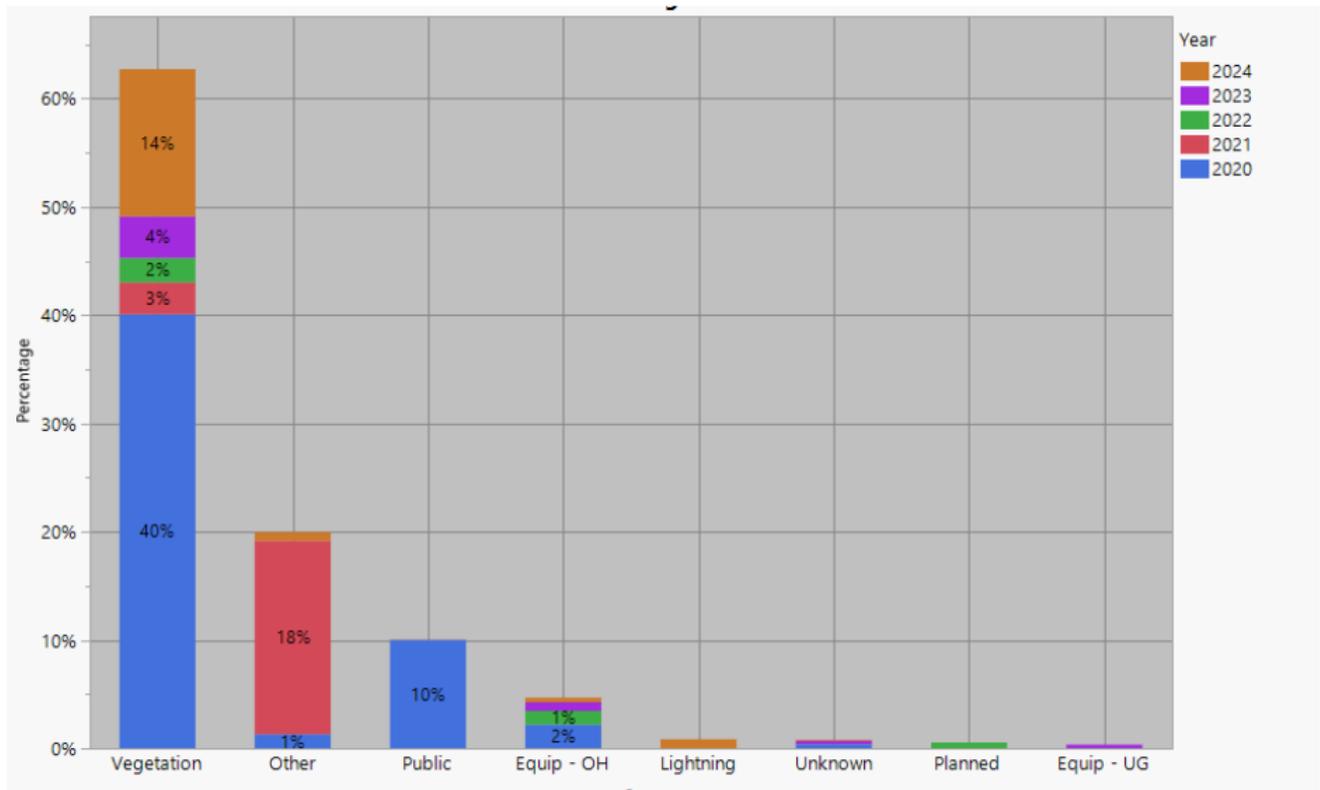
²³² *Id.* at 117

²³³ *Ibid.*

²³⁴ *Id.* at 118

²³⁵ *Ibid.*

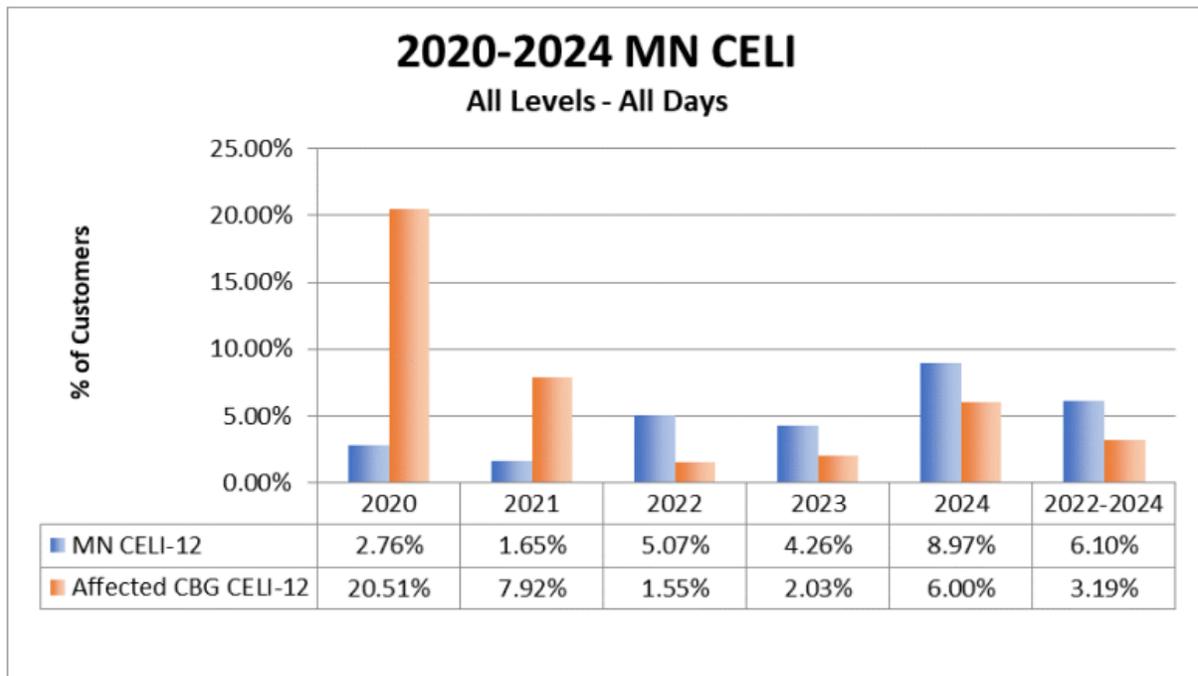
Graph 27
Top Eight Causes of Outage,
by Year, in CBGs With Higher CELI-12



Source: Part 3 of 3: Order Compliance; Graph 27 at 119

Xcel also provides the following chart to illustrate the CELI-12 rates of the affected CBGs versus the rest of Minnesota:²³⁶

Graph 28
CELI-12 in the 27 CBGs with
Higher CELI-12, Relative to
Minnesota Overall



**Source: Part 3 of 3: Order Compliance; Graph 28 at 120*

The graphs above show that the major weather impact from 2020 and the 2021 gas leak event dominate the CELI-12 causes for the studied CBGs. After the events of 2020 and 2021, the three remaining years have had significantly lower than the state-wide average CELI-12 rates.²³⁷ Xcel states that there may be limitations to the use of three-year rolling average data in this analysis.²³⁸ Xcel states:

This highlights a limitation of the three-year rolling average data used in the TRC Study. Relatively small geographic areas can be disproportionately impacted due to the distinct locations where a storm’s most damaging impact occurs. It is not clear based on the current data, what the expected return period is for a storm of similar intensity to the August 14, 2020,

²³⁶ Part 3 of 3: Order Compliance at 120

²³⁷ Part 3 of 3: Order Compliance at 120

²³⁸ *Ibid.*

storm. As a result, the five-year period analysis performed here may not be sufficiently long enough to support conclusions on specific CBGs.²³⁹

The Department requests Xcel, in replies, discuss what a sufficiently long analysis period may be (if not the three-year period utilized in the TRC study) including the availability of the data needed to evaluate CELI-12 trends in the affected CBGs across the longer analysis period.

The Department will review this information and make a recommendation in a subsequent set of comments if it is sufficient.

G.26. Order Point 45 Distribution equipment vintage analysis

Xcel must provide an analysis of distribution equipment vintages in the affected CELI-12 communities and analyze whether upgrading this equipment would be cost effective.

Xcel states that a distribution equipment asset analysis was conducted in 27 CBGs showing increased CELI-12 as identified in the TRC study.²⁴⁰

Xcel states that across its Minnesota service territory, 55.9 percent of the distribution system serving end use customers is overhead, and 44.1 percent is underground.²⁴¹ Comparatively, the aggregate distribution system is approximately 90 percent overhead in the 27 CBG showing increased CELI-12 and 10 percent underground.²⁴² Xcel states that in the identified CBGs, the median housing stock was built before 1951 whereas underground residential distribution construction did not become common until the late 1960s—explaining the supermajority of overhead assets when compared to the aggregate of Xcel’s Minnesota territory.²⁴³ The Company states that the supermajority of overhead exposure combined with the more establish overhead vegetative cover in older neighborhoods correlates with vegetation being the most common cause of CELI-12 events as shown in its tables above.²⁴⁴

The Company states that pole inspection data paired with recent pole installation data is the most comprehensive data it can use to determine distribution equipment vintages. Xcel also utilized CBG Median Year Structure Built data from U.S. Census data to compare the vintage of its poles to the vintage of the homes in its territory. While on average poles in the whole of Xcel’s Minnesota territory are 14 years younger than median ages of homes and buildings, in the 27 affected CBGs, the median pole ages are 33 years younger than the median age of homes and buildings.²⁴⁵ Xcel states that a greater percentage of pole replacements have taken place in the 27 affected CBGs than the whole of

²³⁹ Part 3 of 3: Order Compliance, at 120.

²⁴⁰ *Ibid.*

²⁴¹ *Ibid.*

²⁴² *Ibid.*

²⁴³ *Ibid.*

²⁴⁴ *Id.* at 121

²⁴⁵ *Ibid.*

Xcel's Minnesota territory. Thus, Xcel concludes, overhead line renewal is not likely the best strategy for reliability improvements.²⁴⁶

The Company compared average CELI-12 rates to the percentage of overhead and underground distribution facilities and found that CBGs with higher percentages of underground facilities fared better than those with a greater percentage of overhead facilities.²⁴⁷ Xcel notes that all but three of the 27 affected CBGs fall within the 0-20 percent range for underground distribution assets.²⁴⁸

Regarding potential solutions, Xcel states that the "CELI-12 rate correlation with pole age suggests that a 0.5 to one percent improvement in CELI-12 is possible from overhead pole line renewal activities."²⁴⁹ Replacement of the roughly 71 percent of poles and associated equipment exceeding 50 years in age would total 2,629 poles, 196,000 feet of conductor and associated equipment within the 27 CBGs.²⁵⁰ Xcel provided a rough cost estimate of \$34.3 million dollars and approximately two years' time between approval and construction completion.²⁵¹ The Company states "[h]owever, the projected improvement from overhead system renewal alone is not expected to be capable of bringing the CELI-12 rate down to the Minnesota system average of 4.19 percent due to elevated exposure and risks inherent to the overhead distribution lines."²⁵² The Company explains that the age of the equipment and the replacement of the equipment in the same fashion, does not strongly correlate to decreased reliability risk.²⁵³

In the alternative, the Company proposes targeted undergrounding to take advantage of reduced outage exposure and a high correlation between the percentage of undergrounded assets and reduced CELI-12 rates.²⁵⁴ Xcel states that CELI-12 rates in the 27 identified CBGs could be brought near the Minnesota service territory average by undergrounding approximately 40 percent of its distribution assets in those CBGs. Xcel cites to its Chart 31, which shows Average CELI-12 rate vs Percent of undergrounded assets.²⁵⁵ Currently, a majority of the 27 CBGs (all but three CBGs) fall in the 0.00 percent - 20.00 percent undergrounded column.²⁵⁶ The Company reasons that Undergrounding another 40 percent of its distribution assets in the identified CBGs "would result in roughly 50 percent underground service which is associated with average CELI rates of 3.58 percent in the five-year period studied, which is better than the 4.19 percent Minnesota system average in that period."²⁵⁷

²⁴⁶ *Ibid.*

²⁴⁷ Part 3 of 3: Order Compliance at 123.

²⁴⁸ *Ibid.*

²⁴⁹ *Id.* at 124.

²⁵⁰ *Ibid.*

²⁵¹ *Ibid.*

²⁵² *Ibid.*

²⁵³ *Ibid.*

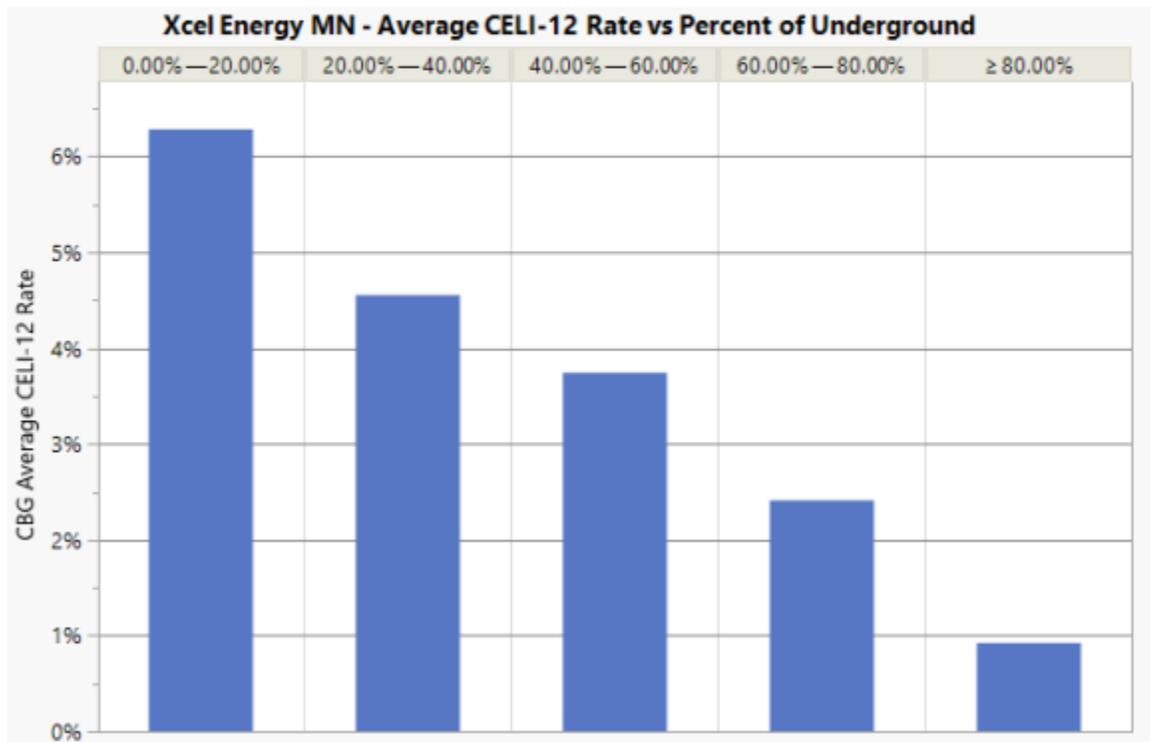
²⁵⁴ *Id.* at 125

²⁵⁵ *Id.* at 125: in its public report, Xcel refers to its Chart 34, however from the description of the chart, the Department believes Xcel intended to cite to its Chart 31. There is not a Chart 34 in the public report.

²⁵⁶ *Id.* at 125

²⁵⁷ *Ibid.*

**Graph 31
Average CELI-12 Rate vs. Percent
of Underground Lines (Minnesota
Service Territory Overall)**



**Source: Xcel Graph 31: Average CELI-12 Rate vs. Percent of Underground Lines (Minnesota Service Territory Overall)²⁵⁸*

Xcel states its targeted undergrounding proposal would replace approximately 110,000 feet of overhead conductors and 325 associated service transformers.²⁵⁹ The Company estimates the costs associated with the project to be approximately \$21.1 and \$31.7 million to be completed in approximately 3 years’ time from project approval.²⁶⁰ However, the Company states there is a level of risk associated with cost uncertainty due to a limited number of comparable past overhead to underground conversion projects.²⁶¹ The Company states that undergrounding, despite the cost risk, is the only method it has identified to date that indicated an ability to bring CELI-12 rates down to the system average within the affected CBGs. The Company states more detail will be proposed in its next Integrated Distribution Plan:

²⁵⁸ Part 3 of 3: Order Compliance at 124.

²⁵⁹ *Id.* at 125.

²⁶⁰ *Ibid.*

²⁶¹ *Ibid.*

The Company recommends pursuing a gradual approach to targeted undergrounding to first address overhead line segments with the highest risk exposure in both the studied areas and overall service territory. The Company plans to provide further detail on its targeted undergrounding plan in its next Integrated Distribution Plan filing later this year.²⁶²

The Department concludes the Company has complied with reporting requirement concerning the analysis included in the order point. The Department infers that Xcel will provide the information on the project's cost-effectiveness in its upcoming IDP filing. Regarding this second reporting requirements, the Department will review the full proposal with the Company's Integrated Distribution Plan filed later this year.

The Department concludes that Xcel has not yet complied with all the aspects of this order point.

G.27. Order Point 46 – Third-party evaluator

Xcel must 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. Xcel must engage interested stakeholders to participate and collaborate with the independent third-party evaluator.

Xcel states it has worked with stakeholders to develop a scope of work for the study required by this order point and will soon issue a Request for Proposals for third-party evaluators with expertise in evaluating racial disparities.²⁶³ The Company states, although the order point states "conduct a one-year study," Xcel is hopeful the study will be complete for inclusion in its next Electric Service Quality Report due in April 2026.²⁶⁴ The Department looks forward to continued stakeholder collaboration on this issue.

The Department concludes that Xcel has not yet complied with all the aspects of this order point as the collaboration is ongoing.

²⁶² Part 3 of 3: Order Compliance at 125.

²⁶³ *Id.* at 126.

²⁶⁴ *Ibid.*

IV. REQUEST FOR VARIANCE TO MINN. R. 7820.2500 REGARDING AMI DISCONNECTION

Minn. R. 7829.3200 provides the Commission can grant a variance to its rules, when the following requirements are met:

- A. Enforcement of the rule would impose an excessive burden upon the applicant or others affected by the rule;
- B. Granting the variance would not adversely affect the public interest; and
- C. Granting the variance would not conflict with standards imposed by law.²⁶⁵

The Commission may require a utility to meet certain conditions before granting a variance. Commission-granted variances expire in one year unless the Commission authorizes a different expiration. The Commission can revoke variances prior to expiration if the utility does not comply with required conditions.²⁶⁶

The specific Commission variance to its rules that Xcel requests concerns a requirement included in Minn. R. 7820.2500.²⁶⁷

Minn. R. 7820.2500 states:²⁶⁸

Service may be disconnected only in conjunction with a personal visit by a representative of the utility to the address where the service is rendered and an attempt to make personal contact with the customer at the address. If the address is a building containing two or more dwelling units, the representative shall make a personal visit to the door of the customer's dwelling unit within the building. If security provisions in the building preclude free access on the part of the representative, the representative shall attempt to gain access to the building from the caretaker, for the purpose of attempting to make personal contact with the customer. The representative of the utility shall at all times be capable of receiving payment, if nonpayment is the cause of the disconnection of service, the representative shall be able to certify that the cause of disconnection has been remedied by the customer. [Emphasis added.]

In support of its requested variance to Minn. R. 7820.2500, Xcel referenced the ineffectiveness of field visits (manual disconnection) as well as the higher cost. The Company also noted that manual

²⁶⁵ [Minn. R. 7829.3200](#).

²⁶⁶ Minn. R. 7829.3200, subpart 3.

²⁶⁷ Petition at 93.

²⁶⁸ [Minn. R. 7820.2500](#).

disconnection is not an effective way to discuss payment arrangements with customers thereby allowing them to avoid being disconnected when compared to remote reconnection.²⁶⁹

The Department’s analysis considers customer protections the Commission has required regarding Xcel’s disconnection policy, employee safety, operational considerations, and cost.

The Department would classify Order Points 19, 22, 23, 24, 26, 27, 28, 29, 30, and 34 in the 2023 SRSQ Order as being customer safeguards directly related to Xcel’s disconnection policy. The Commission also included three order points focused on improving the reach of different existing customer assistance programs in Order Points 20, 21 and 25. In addition, the Commission also required the Company to research new programs or propose a new cost-recovery mechanism that would benefit low-income customer assistance programs in its current rate case in Order Points 31, 32 and 33.

The Commission has increased the level of customer protections associated with the involuntary customer disconnections significantly and Xcel has largely complied.

Xcel has noted in past filings on this topic that remote disconnection is preferable to physical disconnection if one considers the additional personal risk an Xcel field agency experiences when physically disconnecting or reconnecting a customer.²⁷⁰ Hence, remote disconnection/reconnections appear to be safer than manual disconnection/reconnection for Xcel’s employees.

Turning to the operational perspective, the Department reviewed the reconnection time metrics for 2024 Xcel provided in its Petition.²⁷¹ The Company provided Table 9 that included customer reconnection times for both remote and manual reconnection protocols.²⁷² The Department rearranged the information in that table in Tables 20.a through 20.c.

Table 20.a: Average Time by Class for Reconnection for Remote and Manual Protocols - 2024 Results (in average hours)²⁷³

Protocol	Residential	Commercial	All
Remote	0.46	0.49	0.51
Manual	49.99	42.47	48.99
Difference	49.53	41.98	48.48
% Diff.	99%	99%	99%

Remote reconnections for residential customers took 28 minutes on average while manual remote reconnections required 2,999 minutes on average in 2024.²⁷⁴ The results for the commercial class were

²⁶⁹ Petition at 92.

²⁷⁰ Remote Reconnection Variance Order at 17 .

²⁷¹ Petition at 23-24, Table 9.

²⁷² Petition at 24.

²⁷³ Petition at 28.

²⁷⁴ 0.46 hours x 60 minutes per hour = 28 minutes. 49.99 hours x 60 minutes per hour = 2,999 minutes.

similar, (29 and 2,548 minutes respectively)²⁷⁵ while the results for “all” class were 31 minutes and 2,939 minutes.²⁷⁶ The average time it took to reconnect a customer from either customer class was 99% lower than performing a manual reconnection.

Table 20.b: Longest Time by Class for Reconnection for Remote and Manual Protocols - 2024 Results (in average hours)

Protocol	Residential	Commercial	All	Other
Remote	829.11	120.23	829.11	NA
Manual	2522.24	434.73	2522.24	90.78
Difference	1693.13	314.5	1693.13	NA
% Diff.	67%	72%	67%	NA

The longest remote reconnection for a residential customer took 829. 11 hours while the longest manual reconnection for a residential customer required 2,522. 24 hours. Thus, the longest time it took to reconnect a residential customer remotely was 67% lower than longest time it took to reconnect a residential customer manually. The results for the commercial class and “all” class were like the residential customer class results.

Table 20.c: Shortest Time by Class for Reconnection for Remote and Manual Protocols - 2024 Results (in average hours)

Protocol	Residential	Commercial	All	Other
Remote	0.00	0.02	0.00	NA
Manual	0.84	1.27	0.84	1.27
Difference	0.84	1.25	0.84	NA
% Diff.	100%	98%	100%	NA

The shortest time for a remote reconnection for a residential customer took 0 hours while the shortest manual reconnection for a residential customer required .84 hours (50 minutes). Thus, the shortest time it took to reconnect a residential customer remotely was 100% lower than longest time it took to reconnect a residential customer manually. The results for the commercial class and “all” class were like the residential customer class results.

These results suggest the time it takes disconnect and reconnect a customer has on average declined significantly. All other things equal, that development would allow the Company’s employees to “do more with less”.

Considering costs, Xcel provided a table that compared remote and physical disconnect/reconnect costs for 2024 in the filing.²⁷⁷ In 2024 the average cost for a remote disconnect/reconnect was \$19.96

²⁷⁵ 0.49 hours x 60 minutes per hour = 29 minutes. 42.47 hours x 60 minutes per hour = 2,548 minutes.

²⁷⁶ 0.51 hours x 60 minutes per hour = 31 minutes. 48.99 hours x 60 minutes per hour = 2,939 minutes.

²⁷⁷ Petition at 25 Table 10.

and the average cost of a physical disconnection was \$158.31.²⁷⁸ Hence, in 2024 the average cost of a remote disconnect/reconnect was only 13% of the average cost of a physical disconnect/reconnect.²⁷⁹ It appears that it was much more efficient economically to reconnect a customer remotely than it was to reconnect that same customer physically in 2024.

For 2022 and 2023, the average costs of a remote disconnect/reconnect percentages were 12 percent and 14 percent of the average costs of a physical disconnect/reconnect, respectively. These results suggest the cost differential between a remote disconnect/reconnect and a physical disconnect/reconnect has remained constant over that time.²⁸⁰

Given the: 1) extensive customer safeguards the Commission has required to protect customers facing involuntary disconnection in response to the Company's request for a remote reconnection variance; 2) improvement in employee safety resulting from the approval of the variances; 3) the operational benefits of remote disconnect/reconnects and 4) the lower cost of remote disconnect/reconnects compared to physical disconnects, the Department recommends that the Commission approve the Company's request for a variance from Minn. R. 7820.2500 for another year.

V. DEPARTMENT RECOMMENDATIONS

Based on analysis of Xcel's Annual SRSQ Report, and the information in the record, the Department has recommendations correspond to the subheadings of Section III above. The Department has also requested the Company provide additional information for many of the reporting requirements in the Safety and Service Quality Reports. The Department will submit supplemental comments including any additional recommendations after reviewing the information Xcel provides in its reply comments.

A. RESPONSE TO COMMISSION NOTICE

A.1. The Department does not have enough information to provide overall recommendations for the Safety and Service Quality Reports. The Department has made recommendations regarding many of the reporting requirements included in those two reports and has requested Xcel provide additional information on certain reporting requirements included in those two reports. The Department will provide its overall recommendations on those two reports in a subsequent set of comments, as well as its recommendations regarding the separate reporting requirements. Consistent with past practice, the Department will provide its overall recommendation regarding the Service Reliability Report shortly after Xcel files that information.

A.2. The Department recommends the Commission approve Xcel's request to renew its variance to Minn. R. 7825.2500 regarding the requirement the Company physically disconnect customers who are being disconnected for non-payment.

²⁷⁸ Petition at Attachment H.

²⁷⁹ 2024 Average Cost of Remote Reconnection (\$19.96)/ 2024 Average Cost of Physical Reconnection (\$158.31) = 13%.

²⁸⁰ Calculation discussed earlier in comments.

B. ANNUAL SAFETY REPORT

B.1 The Department concludes the Company has complied with the reporting requirement.

B.2 The Department requests Xcel, in reply comments, provide additional information on its efforts to minimize damages from claims.

C. ANNUAL RELIABILITY REPORT – RULES BASED REPORTING REQUIREMENTS

C.1. Reliability Performance – The Department will provide a recommendation on the Company’s Reliability Report after reviewing Xcel’s Supplemental Filing on the IEEE 2024 benchmarking data that the Company will file later in 2025.

C.2. Normalization - The Department recommends the Commission accept the information Xcel has provided as meeting the reporting requirement.

C.3. Action Plan to Improve Reliability - The Department recommends the Commission approve the information Xcel has provided as meeting the reporting requirement.

C.4. Bulk Power Supply Interruptions - The Department recommends the Commission approve the information Xcel has provided as meeting the reporting requirement.

C.5. Major Service Interruptions – The Department requests Xcel, in reply comments, discuss potential process improvements to improve the Company’s performance relative to having Control Center staff email the CAG so that the CAG can notify the Commission’s Consumer Affairs Office.

C.6. Worst Performing Feeders by Work Center - The Department recommends the Commission approve the information Xcel has provided as meeting the reporting requirement.

C.7. Compliance with ANSI Voltage Standards - The Department recommends the Commission approve the information Xcel has provided as meeting the reporting requirement.

C.8. Work Center Staffing Levels - The Department recommends the Commission approve the information Xcel has provided as meeting the reporting requirement.

D. ANNUAL RELIABILITY REPORT – ORDER BASED REPORTING REQUIREMENTS

D.1. 2024 Reliability Performance Summary and Plans

D.1.1. Public Facing Summary on Website - The Department recommends the Commission approve the information Xcel has provided as meeting the reporting requirement.

D.1.2. Description of Policies, Procedures and Actions Company has Implemented or Plans to Implement, to Assure Reliability - The Department requests Xcel, in reply comments, include an explanation of the Company's rationale for: 1) not increasing the budget for the Vegetation Management Program beginning in 2022 when it was apparent that the program's labor costs were increasing at a rate well above inflation; and, 2) why Xcel allowed the number of miles trimmed under the program decline from 2019 to 2024.

D.2. Order Based Reliability Metrics Information and Reporting Requirements:

D.2.1. Benchmarks and Reporting - The Department recommends the Commission approve the information Xcel has provided as meeting the reporting requirement.

D.2.2. Feeder Specific Reporting Requirements Provided Electronically - The Department recommends the Commission approve the information Xcel has provided as meeting the reporting requirement.

D.2.3. Grid Modernization Investment Reporting Requirements for SAIDI, SAIFI, CAIDI and MAIFI - The Department recommends the Commission approve the information Xcel has provided as meeting the reporting requirement.

D.2.4. Various Reliability Related Reporting Requirements

- i. Non-normalized SAIDI, SAIFI and CAIDI Values - The Department recommends the Commission approve the information Xcel has provided as meeting the reporting requirement.
- ii. Normalized SAIDI, SAIFI and CAIDI Values - The Department recommends the Commission approve the information Xcel has provided as meeting the reporting requirement.
- iii. Non-normalized and Normalized MAIFI Values - The Department recommends the Commission approve the information Xcel has provided as meeting the reporting requirement.
- iv. ERT information within -90 minutes to 0 and within +1 to +30 minutes - The Department recommends the Commission approve the information Xcel has provided as meeting the reporting requirement.
- v. Non-normalized and normalized CEMI at outage levels of 4, 5, and 6 interruptions - The Department recommends the Commission approve the information Xcel has provided as meeting the reporting requirement.
- vi. Highest number of interruptions experienced by one customer - The Department recommends the Commission approve the information Xcel has provided as meeting the reporting requirement.

Analysts assigned: John Kundert, Rachel Wiedewitsch

- vii. Non-normalized and normalized CELI at outage duration of greater than 6, 12, and 24 hours - The Department recommends the Commission approve the information Xcel has provided as meeting the reporting requirement.
- viii. Longest interruptions experienced by one customer - The Department recommends the Commission approve the information Xcel has provided as meeting the reporting requirement.
- ix. Performance and reliability factors by customer class – The Department requests Xcel, in reply comments, provide the analysis underlying the performance and reliability factors by customer class included in Table 14B.
- x. Field office personnel information which includes the number of contractors by work center- The Department recommends the Commission approve the information Xcel has provided as meeting the reporting requirement.
- xi. Causes of sustained customer outages, by work center - The Department recommends the Commission approve the information Xcel has provided as meeting the reporting requirement.
- xii. Fault Location Isolation and Service Restoration (FLISR) Reporting Requirement - Fault Location Isolation and Service Restoration (FLISR) Reporting Requirement.

D.3 Reliability Standards for 2025 – The Department defers making a recommendation until it has had the opportunity to the IEEE 2024 Benchmark information Xcel will provide in a supplemental filing.

E. ANNUAL SERVICE QUALITY REPORT – RULES BASED REPORTING REQUIREMENTS

E.1. Meter Reading Performance - The Department recommends the Commission approve the information Xcel has provided as meeting the reporting requirement.

E.2. Involuntary Disconnection - The Department recommends the Commission approve the information Xcel has provided as meeting the reporting requirement.

E.3. Service Extension Response Times – The Department requests Xcel, in reply comments, confirm or correct the Department’s interpretation of the information provided in the Petition in Tables 2C and 2D in its reply comments.

E.4. Call Center Response Times- The Department recommends the Commission approve the information Xcel has provided as meeting the reporting requirement.

E.5. Emergency Medical Account Status - The Department recommends the Commission approve the information Xcel has provided as meeting the reporting requirement.

E.6. Customer Deposits - The Department recommends the Commission approve the information Xcel has provided as meeting the reporting requirement.

E7. Customer Complaints - The Department recommends the Commission approve the information Xcel has provided as meeting the reporting requirement.

F. ANNUAL SERVICE QUALITY REPORT – ORDER BASED REPORTING REQUIREMENTS

F.1. Field Orders - The Department recommends the Commission approve the information Xcel has provided as meeting the reporting requirement.

F.2. C&I Credit Card Calls - The Department recommends the Commission approve the information Xcel has provided as meeting the reporting requirement.

F.3. Elimination of the Standalone Annual Summary of Customer Complaints docket (YY-13) and Requiring Utilities to include complaint data from Minnesota Rules 7820.0500 in their Annual Service Quality Reports with data filed as part of Minnesota Rules 7826.2000. - The Department recommends the Commission approve the information Xcel has provided as meeting the reporting requirement.

F.4. Electronic Customer Contracts - The Department recommends the Commission approve the information Xcel has provided as meeting the reporting requirement. The Department also recommends the Commission require Xcel to continue reporting uptime of utility-customer interactive platforms to maintain transparency on performance.

F.5. AMI Disconnect/Reconnect Reporting:

F.5.1. Medical Necessary Equipment and Emergency Certification program - The Department recommends the Commission approve the information Xcel has provided as meeting the reporting requirement. The Department includes the following summary of Disconnection and Reconnection Reporting Requirements as a help to the reader.

F.5.1.2. Meter-related complaints for advanced metering infrastructure - The Department recommends the Commission approve the information Xcel has provided as meeting the reporting requirement.

F.5.1.3. The percentage of customers flagged for disconnection who pay their disconnection amount in full in the current process versus after the variance has been implemented - The Department recommends the Commission approve the information Xcel has provided as meeting the reporting requirement.

F.5.1.4. The number of field visits required when the Company is unable to reach customers (speaking to the customer or leaving a voicemail) -- The Department recommends the Commission approve the information Xcel has provided as meeting the reporting requirement.

F.5.1.5 The length of time for reconnecting each customer, and the method for reconnecting the customer - The Department recommends the Commission approve the information Xcel has provided as meeting the reporting requirement.

F.5.1.6. Re-analysis of actual costs for disconnection/reconnection requiring in-person visits and those performed remotely -- The Department recommends the Commission approve the information Xcel has provided as meeting the reporting requirement.

F.5.1.7. Detailed cost information and subsequent analysis of costs as opposed to the Company's proposed language stating adjustment to costs can be made following the first year of reporting -- The Department recommends the Commission approve the information Xcel has provided as meeting the reporting requirement.

F.5.1.8. Progress exploring texting capabilities for customer contact and progress on an automated process for reconnection -- The Department requests Xcel, in reply comments, provide an update on the plan and timeline for implementing texting capabilities for reconnection and customer contact.

F.5.1.9. Progress adding a direct link on its website to submit the Medically Necessary Equipment and Emergency Certification Form -- The Department requests Xcel, in reply comments, expand on its explanation about the complexities of direct submission of its Medically Necessary Equipment & Emergency Certification form. Specifically, is the Company proposing that it simply will not or cannot add a direct link currently and is requesting a change to this reporting requirement? In the alternative, is there a cost-effective alternative for a direct link to its website?

F.5.1.10. Detailed information on the number of customers opting out of AMI meter installation and demand-billed customers compared to customers with AMI meters installed -- The Department recommends the Commission approve the information Xcel has provided as meeting the reporting requirement.

F.5.1.11. Results from a stakeholder meeting discussing/evaluating the metric requirements listed above -- The Department recommends the Commission approve the information Xcel has provided as meeting the reporting requirement.

G. PART 3 OF 3 – REPORTING REQUIREMENTS FROM THE 2023 SRSQ ORDER

G.1. Order Point 6 - The Department will provide a recommendation on the Company's 2024 Reliability Report and its 2025 reliability goals after reviewing Xcel's Supplemental Filing on the Institute of Electrical and Electronic Engineers) 2024 benchmarking data that the Company will file later in 2025.

G.2. Order Point 7 – The Department will provide a recommendation on the Company's 2024 Reliability Report and its 2025 reliability goals after reviewing Xcel's Supplemental Filing on the Institute of Electrical and Electronic Engineers 2024 benchmarking data that the Company will file later in 2025.

G.3. Order Point 14 - The Department recommends the Commission approve the information Xcel has provided as meeting the reporting requirement.

Analysts assigned: John Kundert, Rachel Wiedewitsch

G.4. Order Point 15 – The Department recommends the Commission approve the information Xcel has provided as meeting the reporting requirement.

G.5. Order Points 16, 17 and 18 - The Department recommends the Commission approve the information Xcel has provided as meeting the reporting requirement.

G.6. Order Point 19 - The Department requests Xcel, in reply comments, provide an update on the status of adding the additional electronic, final contact method.

G.7. Order Point 21 - The Department requests Xcel, in reply comments, compare the number of outreach campaigns completed in 2024 to the number of outreach campaigns completed in prior years. The Department also requests Xcel, in reply comments, summarize any lessons learned from the outreach campaigns it completed in 2024 (i.e. which mode was most effective; what were the outcomes of the campaigns; was there an increase in energy assistance enrollments following the campaigns; etc.).

G.8. Order Point 22 - The Department recommends the Commission approve the information Xcel has provided as meeting the reporting requirement.

G.9. Order Point 23 - The Department recommends the Commission approve the information Xcel has provided as meeting the reporting requirement.

G.10. Order Point 24 - The Department recommends the Commission approve the information Xcel has provided as meeting the reporting requirement.

G.11. Order Point 25 - The Department requests Xcel, in replies, propose a plan to proactively provide information regarding medical protections (before a customer may be facing disconnection or calling for help).

G.12. Order Point 26 - The Department recommends the Commission approve the information Xcel has provided as meeting the reporting requirement.

G.13. Order Point 27 - The Department recommends the Commission approve the information Xcel has provided as meeting the reporting requirement.

G.14. Order Point 28 - The Department recommends the Commission approve the information Xcel has provided as meeting the reporting requirement.

G.15. Order Point 29 - The Department recommends the Commission approve the information Xcel has provided as meeting the reporting requirement.

G.16. Order Point 30 - The Department recommends the Commission approve the information Xcel has provided as meeting the reporting requirement.

G.17. Order Point 31 –

Analysts assigned: John Kundert, Rachel Wiedewitsch

G.17.1 -The Department recommends Xcel, in reply comments, file “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,” as originally ordered at Order Point 31.b.

G.17.2 -The Department requests Xcel, in reply comments, explain its concern regarding the impact the additional months of disconnection suspension may have on the increased need for energy assistance funding and the potential for more customers to experience hardship.

G.18. Order Point 32 - The Department recommends the Commission approve the information Xcel has provided as meeting the reporting requirement.

G.19. Order Point 33 - The Department recommends the Commission approve the information Xcel has provided as meeting the reporting requirement.

G.20. Order Point 34 - The Department recommends the Commission approve the Company’s filing of supplemental direct testimony on March 17, 2025 in Docket No. E002/GR-24-320 as meeting the reporting requirement.

G.21 -Order Points 35 and 36 - The Department requests Xcel, in reply comments, provide an update on the progress and timeline of its goal of developing and administering a new training that focuses on overcoming unintended bias in customer interactions during service interruptions.

G.22. Order Point 37 - The Department recommends the Commission approve the information Xcel has provided as meeting the reporting requirement.

G.23. Order Points 39, 40 and 41 - The Department requests Xcel, in reply comments, provide an update on its progress updating the map to align with the EOY 2024 vintage. The Department also requests Xcel, in reply comments, provide an update on its progress to add the “average age for disconnected premises” and “average amount of arrears for disconnected premises” to its map.

G.24. Order Point 42 - The Department has no recommendation.

G.25 Order Points 38 and 44 – The Department requests Xcel, in replies, discuss what a sufficiently long analysis period may be (if not the three-year period utilized in the TRC study) including the availability of the data needed to evaluate CELI-12 trends in the affected CBGs across the longer analysis period.

G.26. Order Point 45 – The Department concludes the Company has complied with reporting requirement concerning the analysis included in the order point. The Department infers that Xcel will provide the information on the project’s cost-effectiveness in its upcoming IDP filing. Regarding this second reporting requirements, the Department will review the full proposal with the Company’s Integrated Distribution Plan filed later this year.

G.27. Order Point 46 – The Department recommends the Commission find Xcel has not yet complied with this Order Point because the stakeholder collaboration is ongoing.

H. REQUEST FOR VARIANCE TO MINN. RULE 7820.2500 REGARDING AMI DISCONNECTION

The Department recommends the Commission approve Xcel's request for a variance from Minn. R. 7820.2500 for another year.

Appendix

Attachments

Attachments

Title	Description	Topic
DOC-1	DOC IR No. 24/Company response	Vegetation Management
DOC-2	DOC IR No. 22/Company response	Meter Reading
DOC-3	DOC IR No. 12/Company response	Involuntary Disconnection
DOC-4	DOC IR No. 14/Company response	Service Extensions
DOC-5	DOC IR No. 15/Company response	Call Center Response Times
DOC-6	DOC IR No. 11/Company's response	Involuntary Disconnection

- Not-Public Document – Not For Public Disclosure
- Public Document – Not-Public Data Has Been Excised
- Public Document

Xcel Energy Information Request No. 24
Docket No.: E002/M-25-27
Response To: Minnesota Department of Commerce
Requestor: John Kundert
Date Received: May 30, 2025

Question:

Topic: Vegetation Management Program

Reference(s): Part II, Annual 2024 SRSQ Report, filed April 1, 2025, page 40

The Company states:

“The overall goal of our Vegetation Management Program is to maintain an approximate five-year cycle of continual vegetation maintenance”.

- a. What were the Company’s forecasted and actual annual cycles of continual vegetation maintenance for 2019 through 2024?
- b. What were the Company’s forecasted and actual budgets for the Vegetation Management program for calendar years 2019 through 2024?
- c. What was the average hourly labor cost for the Vegetation Management program calendar years 2019 through 2024?

Response:

- a. The Company interprets “forecasted and actual annual cycles of continual vegetation maintenance” to mean miles planned and completed per year. As the Company tracks targets at the operating company level, i.e. Northern States Power Minnesota (NSPM), the table below includes data for North Dakota and South Dakota. Any variance between these numbers and data reported in Docket No. E002/M-25-27, Attachment J, Page 6 of 9, Table 2 can be reasonably assumed to be due to ND and SD work. Please see the table below.

	2019	2020	2021	2022	2023	2024
Forecasted Miles NSPM	3,421	2,751	2,653	3,441	3,121	1,232
Actual Miles NSPM	3,096	1,652	2,299	2,900	1,391	1,131

b. The table below shows the annual budget from January of each year compared to year-end actual spend for NSPM between 2019 through 2024. As above, this data is for NSPM, including MN, ND and SD operations, and including vegetation management work on the distribution system, substations and transmission.

	2019	2020	2021	2022	2023	2024
Forecasted Budget NSPM (\$M)	\$34.1	\$34.6	\$40.8	\$41.5	\$49.1	\$37.1
Actual Spend NSPM (\$M)	\$34.2	\$22.6	\$33.4	\$38.9	\$30.7	\$31.6

c. The Company is able to provide a ‘loaded’ cost per labor hour – with ‘loaded’ meaning the total cost of invoicing including equipment, labor, materials, and taxes divided by total labor hours. Here is a table showing the loaded cost per labor hour from 2019 through 2024:

	2019	2020	2021	2022	2023	2024
Loaded \$/Labor Hour	\$62.89	\$64.08	\$66.21	\$71.68	\$81.63	\$94.22

Preparer:	Fletcher Johnson	Rich Alexander
Title:	Director, Vegetation Management & Pole Integrity	Manager, Operations
Department:	Vegetation Management	Vegetation Management
Telephone:	612-418-9761	612-405-0410
Date:	June 9, 2025	

- Not-Public Document – Not For Public Disclosure
- Public Document – Not-Public Data Has Been Excised
- Public Document

Xcel Energy Information Request No. 22
Docket No.: E002/M-25-27
Response To: Minnesota Department of Commerce
Requestor: John Kundert
Date Received: May 30, 2025

Question:

Topic: Meter Reading

Reference(s): Part I, Annual 2024 SRSQ Report, filed April 1, 2025, Attachment C, page 8

The Company states:

“We have removed “deleted meters” from the total number of meters installed. The “deleted meters” designation is given to meters that were incorrectly entered into the system and were never truly installed at a premise. This ensures our data is more representative of meters in the field”.

- a. How many meters did the Company remove from the total number of meters installed at the end of December 2024 in nominal and percentage terms?
- b. Please explain the process whereby a meter that is not physically installed at a premise is classified as being installed.
- c. Would this removal of uninstalled meters from the total number of meters affect the amount of meter-related rate base the Company in the development of a revenue requirement in a general rate case proceeding?

Response:

- a. Contrary to the cited table footnote, deleted meters were inadvertently not removed from the table on page 8 of Attachment C. We provide below a revised table where those deleted meters have been removed. The difference as of year-end 2024 is 3,927 meters or 0.2 percent of the total population of installed meters. The Company intends to file an errata in the near future with corrections.

	Residential	Commercial	Industrial	Other	Total
January	1702997	169038	13339	3734	1889108
February	1704567	169033	13333	3732	1890665
March	1705634	169152	13332	3731	1891849
April	1707100	169139	13329	3727	1893295
May	1708866	169181	13319	3720	1895086
June	1709993	169288	13318	3716	1896315
July	1711341	169468	13309	3712	1897830
August	1712824	169551	13296	3710	1899381
September	1714456	169657	13295	3699	1901107
October	1715888	169776	13290	3703	1902657
November	1716858	169993	13285	3702	1903838
December	1718984	170220	13272	3706	1906182

- b. The process whereby a meter that is not physically installed at a premise is classified as being installed is due to a timing lag between two systems. These instances occur when installed in-the-field meters have been removed and recorded as removed in our meter management system, but have not been removed in our billing system because the order has not been manually completed. The total number of meters installed table on Page 8 of Attachment C reflects data from the billing system. The table included in our response above is sourced from our meter management system and reflects the more accurate picture of the number of meters in the field.
- c. The removal of uninstalled meters would not affect the development of the revenue requirement in a general rate case proceeding because the uninstalled meters are returned to meter stock to be used again. Meter related rate base includes installed meters and stock of meters.

Preparer: Cory Trusty
Title: Performance Analyst
Department: Meter Reading Support
Telephone: (715)-737-7038
Date: June 9, 2025

- Not-Public Document – Not For Public Disclosure
 Public Document – Not-Public Data Has Been Excised
 Public Document

Xcel Energy Information Request No. 12
Docket No.: E002/M-25-27
Response To: Minnesota Department of Commerce
Requestor: John Kundert
Date Received: May 30, 2025

Question:

Topic: Involuntary Disconnection

Reference(s): Part I, Annual 2024 SRSQ Report, filed April 1, 2025 , page 9

2. The Company states:

“Prior to AMI, resource and time constraints meant that the Company was disconnecting only about six percent of customers eligible for disconnection”.

- a. What percentage of eligible customers did the Company disconnect in 2023, 2024 and 2025 YTD?

- b. What percentage of customers did the Company disconnect in 2024?

Response:

- a. The Company disconnected five percent of customers eligible for disconnection in 2023, 14 percent in 2024, and 8 percent through April of 2025.

 - b. The Company disconnected three percent of customers in 2024.
-

Preparer: Dawn Pittman
Title: Manager, Revenue Cycle
Department: Customer Care Field Operations
Telephone: 715-852-5864
Date: June 9, 2025

- Not-Public Document – Not For Public Disclosure
- Public Document – Not-Public Data Has Been Excised
- Public Document

Xcel Energy Information Request No. 14
Docket No.: E002/M-25-27
Response To: Minnesota Department of Commerce
Requestor: John Kundert
Date Received: May 30, 2025

Question:

Topic: Service Extension Response Times

Reference(s): Part I, Annual 2024 SRSQ Report, filed April 1, 2025 , page 12

4. The Company states:

“When excluding these three service centers (roughly 27 percent of the total volume), the average days for a residential service extension is reduced to 15 days”.

- a. Please provide the analytical support for this statement.

Response:

- a. 2024 had 6,966 new residential service requests in Minnesota with an average connection time of 29.7 days. Removing St. Cloud, Monticello, and Maple Grove Service Centers (the ones most affected by 34.5kV single phase transformer supply chain shortages) results in 5,307 new residential service requests with an average connection time of 15.8 days. This is a 24% reduction in total number of new service requests and approximately 50% faster average connection time. A table showing the average number of days to complete new residential electrical service requests, with those three service centers removed, is below.

Electric													
Residential	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total 2024
# of Installations	418	373	315	390	429	368	421	404	547	512	456	404	5037
Average days to complete from customer to site ready	21.8	9.7	14.4	12.2	20.4	17.9	15.7	16.5	14	16.7	16.5	12.6	15.8

Preparer: Markus Franz
Title: Manager, Distribution Design
Department: Electric Distribution
Telephone: 612-430-1050
Date: June 6, 2025

- Not-Public Document – Not For Public Disclosure
 Public Document – Not-Public Data Has Been Excised
 Public Document

Xcel Energy Information Request No. 15
Docket No.: E002/M-25-27
Response To: Minnesota Department of Commerce
Requestor: John Kundert
Date Received: May 30, 2025

Question:

Topic: Call Center Response Times

Reference(s): Part I, Annual 2024 SRSQ Report, filed April 1, 2025 , page 13

5. The Company states:

“Staffing challenges and severe weather events were the main drivers of the lower Telephone Response Time performance in 2024. Staffing issues were largely caused by a challenging hiring market and recruiting efforts falling short, resulting in new hire classes that were not as full as we were targeting”.

- a. Please identify the factors contributing to “a challenging hiring market”.
- b. Did the Company make any changes to its recruiting efforts for new agents in response to those results?

Response:

Xcel Energy has primary contact centers located in Eau Claire, Wisconsin and Amarillo, Texas. To ensure staffing redundancy between sites, we strive to balance hiring in both states. In Wisconsin, we encountered a slower response in 2024 with hiring. The Company’s customer care team worked with Recruiting to evaluate contributing factors and made the following changes based on our findings:

- Enhanced our job advertising in Wisconsin to attract more candidates.
- Made updates to the Contact Center job description for clearer understanding of job expectations and responsibilities.
- Proactively reached out to applicants through our Xcel Energy Recruiting Team to help answer any position-related questions applicants may have.
- Increased starting wage from \$18 to \$20 per hour in Wisconsin to better align with geographical pay standards and ensure our compensation remains competitive.

Preparer: Matthew Chad
Title: Sr Dir, Contact Center Ops
Department: Customer Care Contact Center
Telephone: 651-639-4349
Date: June 9, 2025

- Not-Public Document – Not For Public Disclosure
 Public Document – Not-Public Data Has Been Excised
 Public Document

Xcel Energy Information Request No. 11
Docket No.: E002/M-25-27
Response To: Minnesota Department of Commerce
Requestor: John Kundert
Date Received: May 30, 2025

Question:

Topic: Involuntary Disconnection

Reference(s): Part I, Annual 2024 SRSQ Report, filed April 1, 2025 , page 8

1. The Company states:

“It remains possible that allowing customers to set arrangements for lower down payments may lead to higher arrears balances and a higher number of broken payment arrangements. The Company will monitor these metrics closely”.

- a. Has the Company collected enough information to determine if the policy changes have led to higher arrears balances and a higher number of broken payment arrangements.
 - i. If so, please provide this information.
 - ii. If not, when does Xcel anticipate it will have enough information to make this determination?

Response:

- a. No. As payment plans can be set for up to a 12-month period, the company does not yet have a full year of data to determine if the lower down payment structure, instituted beginning January 2025, has led to either higher arrears balances and/or a higher number of broken payment arrangements. Information on arrears balances and broken payment arrangements in 2025, as compared to prior years, can be shared in the 2025 Annual Report on safety, reliability, and service quality if the Commission so orders.

Preparer: Kathryn Brown
Title: Manager
Department: Customer Assistance and
Advocacy
Telephone: (806)-513-1494
Date: June 9, 2025

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
Comments**

Docket No. E002/M-25-27

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

/s/Nicole Westling

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Marisa	Bayer	mbayer@edinamn.gov	City of Edina		4801 W 50th St Edina MN, 55424 United States	Electronic Service		No	Official 25-27
2	James J.	Bertrand	james.bertrand@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-27
3	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	Official 25-27
4	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	Official 25-27
5	Olivia	Carroll	oliviac@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St W1360 St. Paul MN, 55101 United States	Electronic Service		No	Official 25-27
6	Gabriel	Chan	gabechan@umn.edu			130 Hubert H. Humphrey Center 301 19th Ave S Minneapolis MN, 55455 United States	Electronic Service		No	Official 25-27
7	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St, Louis MO, 63119-2044 United States	Electronic Service		No	Official 25-27
8	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	Official 25-27
9	Riley	Conlin	riley.conlin@xcelenergy.com	Northern States Power Company dba Xcel Energy-Elec		414 Nicollet Mall, 401 8th Floor Minneapolis MN, 55401 United States	Electronic Service		No	Official 25-27
10	Brandon	Crawford	brandonc@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 St. Paul MN, 55101 United States	Electronic Service		No	Official 25-27
11	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042	Electronic Service		No	Official 25-27

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						United States				
12	Christopher	Droske	christopher.droske@minneapolismn.gov	Northern States Power Company dba Xcel Energy-Elec		661 5th Ave N Minneapolis MN, 55405 United States	Electronic Service		No	Official 25-27
13	John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance		2720 E. 22nd St Institute for Local Self-Reliance Minneapolis MN, 55406 United States	Electronic Service		No	Official 25-27
14	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	Official 25-27
15	Shubha	Harris	shubha.m.harris@xcelenergy.com	Xcel Energy		414 Nicollet Mall, 401 - FL 8 Minneapolis MN, 55401 United States	Electronic Service		No	Official 25-27
16	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	Official 25-27
17	Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.		445 Etna Street Ste. 61 St. Paul MN, 55106 United States	Electronic Service		No	Official 25-27
18	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	Official 25-27
19	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-27
20	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-27
21	William	Kenworthy	will@votesolar.org			1 South Dearborn St Ste 2000 Chicago IL, 60603 United States	Electronic Service		No	Official 25-27

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
22	Samuel B.	Ketchum	sketchum@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-27
23	Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.		8300 Norman Center Drive Suite 1000 Bloomington MN, 55437 United States	Electronic Service		No	Official 25-27
24	Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	Official 25-27
25	Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	Official 25-27
26	Erica	McConnell	emcconnell@elpc.org	Environmental Law & Policy Center		35 E. Wacker Drive, Suite 1600 Chicago IL, 60601 United States	Electronic Service		No	Official 25-27
27	Tony	Mendoza	tony.mendoza@sierraclub.org	Sierra Club Environmental Law Program		2101 Webster St. 13th Floor Oakland CA, 94612 United States	Electronic Service		No	Official 25-27
28	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	Official 25-27
29	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	Official 25-27
30	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-27
31	Pouya	Najmaie	najm0001@gmail.com	Cooperative Energy Futures		3416 16th Ave S Minneapolis MN, 55407 United States	Electronic Service		No	Official 25-27
32	Scott	Neal	sneal@edinamn.gov	City of Edina		4801 W 50th St Edina MN, 55424 United States	Electronic Service		No	Official 25-27
33	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402	Electronic Service		No	Official 25-27

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						United States				
34	Carol A.	Overland	overland@legalectric.org	Legaelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	Official 25-27
35	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	Official 25-27
36	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy		26 E Exchange St, Ste 206 St. Paul MN, 55101-1667 United States	Electronic Service		No	Official 25-27
37	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall, MN1180-07-MCA Minneapolis MN, 55401-1993 United States	Electronic Service		No	Official 25-27
38	George	Shardlow	george@energycents.org	Energy CENTS Coalition		823 E. 7th Street Saint Paul MN, 55106 United States	Electronic Service		No	Official 25-27
39	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	Official 25-27
40	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-27
41	Lauren	Steinhaeuser	lauren.steinhaeuser@xcelenergy.com	Northern States Power Company dba Xcel Energy		414 Nicollet Mall, 401-08 Minneapolis MN, 55401 United States	Electronic Service		No	Official 25-27
42	James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-27
43	Carla	Vita	carla.vita@state.mn.us	MN DEED		Great Northern Building 12th Floor 180 East Fifth Street St. Paul MN, 55101 United States	Electronic Service		No	Official 25-27

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44	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-27
45	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	Official 25-27
46	Patrick	Zomer	pat.zomer@lawmoss.com	Moss & Barnett PA		150 S 5th St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-27