

August 1, 2018

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

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E015/M-18-250

Dear Mr. Wolf:

Attached are the comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the following matter:

Minnesota Power's 2018 Safety, Reliability and Service Quality Standards Report.

The 2017 report was filed on April 2, 2018 by:

Jenna Warmuth
Senior Public Policy Advisor
Minnesota Power
30 West Superior Street
Duluth, Minnesota 55802-2093

The Department recommends that the Minnesota Public Utilities Commission (Commission) **accept Minnesota Power's Safety, Reliability and Service Quality Standards Report and set reliability goals for 2018 at 2017 levels. The Department will make a final recommendation as to Minnesota Power's proposed Reconnect Pilot Program in Reply Comments.** The Department is available to answer any questions that the Commission may have on this matter.

Sincerely,

/s/ DANIELLE D. WINNER
Rates Analyst

DDW/ja
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. E015/M-18-250

I. INTRODUCTION

Minnesota Rules, Chapter 7826 (effective January 28, 2003) were developed as a means for the Minnesota Public Utilities Commission (Commission) to establish safety, reliability and service quality standards for utilities “engaged in the retail distribution of electric service to the public” and to monitor their performance as measured against those standards. There are three main annual reporting requirements set forth in the rule. These are:

- (1) the annual safety report (Minnesota Rules, part 7826.0400),
- (2) the annual reliability report (Minnesota Rules, part 7826.0500, subp. 1 and 7826.0600, subp. 1), and
- (3) the annual service quality report (Minnesota Rules, part 7826.1300).

On April 2, 2018, Minnesota Power (MP or the Company) filed a petition (2018 Annual Report) to comply with the Commission’s September 15, 2017 Order¹ and the requirements of Minnesota Rules, Chapter 7826. Section II of these Comments addresses the Company’s 2018 Annual Report.

In addition, Minnesota Power included in its filing a proposal for a new Reconnect Pilot Program. This program was initially proposed in the Company’s last rate case (Docket No. E015/GR-16-664); the Commission declined to rule on whether or not the pilot should be implemented. Section III of these Comments addresses the Company’s proposal.

II. SUMMARY OF REPORT AND DEPARTMENT ANALYSIS

The Minnesota Department of Commerce, Division of Energy Resources (Department) reviewed MP’s 2018 Annual Report to assess compliance with Minnesota Rules, Chapter 7826 and the Commission’s September 15, 2017 Order. Information from past annual reports was used to facilitate the identification of issues and trends regarding MP’s performance.

¹ See Docket Nos. E015/M-16-268 and E015/M-17-252.

A. ANNUAL SAFETY REPORT

The Annual Safety Report consists of two parts:

1. a summary 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
2. a description of all incidents during the calendar year in which an injury requiring medical attention or property damage resulting in compensation occurred as a result of downed wires or other electrical system failures and all remedial action taken as a result of any injuries or property damage described.

The following tables are a compilation of MP's summaries of the reports the Company filed with OSHA and OSHD for the previous 10 years.

Table 1: Number of Cases

	Number of Deaths	Number of Cases with Days Away from Work	Number of Cases with Job Transfer or Restriction	Other Recordable Cases
2008	0	16	6	14
2009	0	5	8	17
2010	1	6	8	19
2011	0	3	10	14
2012	0	4	10	8
2013	0	4	3	17
2014	0	3	8	10
2015	0	5	4	8
2016	0	8	5	15
2017	0	10	6	15

According to press reports, the fatality in 2010 was due to electrocution. The OSHA investigation found no hazards at the location that may have contributed to the death. No citations were issued to MP in the matter.

Table 2: Number of Work Days Impacted by Cases

	Days of Job Transfer or Restriction	Days Away from Work
2008	778	374
2009	215	56
2010	641	139
2011	353	43
2012	598	105
2013	218	29
2014	267	26
2015	115	26
2016	171	107
2017	629	139

Table 3: Injury & Illness Types

	Injuries	Skin Disorders	Respiratory Conditions	Poisonings	All Other Illnesses
2008	31	2	1	0	2
2009	27	3	0	0	0
2010	32	1	1	0	0
2011	26	1	0	0	0
2012	22	0	0	0	0
2013	23	1	0	0	0
2014	21	0	0	0	0
2015	17	0	0	0	0
2016	28	0	0	0	0
2017	31	0	0	0	0

MP stated that there were no incidents in 2017 in which injuries requiring medical attention occurred because of downed wires or other electrical system failures.

The following table summarizes MP’s current and past reporting on incidents in which property damage resulting in compensation occurred as a result of downed wires or other electrical system failures.

Table 4: Property Damage Claims

	Number of Claims	Amount Paid
2008	45	\$45,526.73
2009	35	\$46,626.53
2010	22	\$50,634.22
2011	28	\$26,883.41
2012	17	\$12,796.63
2013	35	\$71,796.27
2014	23	\$26,939.32
2015	29	\$76,375.92
2016	16	\$15,466.26
2017	4	\$4,364.27

In 2017, MP filed very few claims and had a much lower amount paid in claims compared to previous years. Between 2016 and 2017, there was a 75 percent decrease in the number of claims filed and 72 percent decrease in the dollar amount paid for claims. As has been true in many past years, a majority of the claims paid in 2017 (\$4,101, or 94 percent) were as a result of damage due to “work procedure.”

The Department acknowledges MP’s fulfillment of Minnesota Rules, part 7826.0400.

B. ANNUAL RELIABILITY REPORT

Minnesota Rules, part 7826.0500 requires each utility to file an annual report that includes the following information:

1. reliability performance,
2. storm-normalization method,
3. action plan for remedying any failure to comply with reliability goals,
4. bulk power supply interruption,
5. major service interruptions,
6. circuit interruption data (identify worst-performing circuit),
7. known instances in which nominal voltages did not meet American National Standards Institute (ANSI) standards,
8. work center staffing levels, and
9. any other relevant information.

1. *Reliability Performance*

MP considers its entire service area as a single work center. In Docket No. E015/M-17-252, the Commission set the Company's reliability goals for 2017 as follows:²

- SAIDI (average number of minutes a customer was without power) = 98.19
- SAIFI (average number of times a customer was without power) = 1.02
- CAIDI (average minutes per outage for customers who lose power) = 96.26

MP reported the following reliability performance for 2017:

2017	Actual Performance	Performance Goals	Results
SAIDI	108.06	98.19	Did not meet goal
SAIFI	1.04	1.02	Did not meet goal
CAIDI	103.90	96.26	Did not meet goal

The Department acknowledges MP's fulfillment of the requirements of Minnesota Rules, part 7826.0500, subp. 1A, B, and C. The Department notes that MP did not meet its goals for SAIDI, SAIFI, or CAIDI in 2017. Further discussion of MP's 2017 reliability performance is provided in section II.B.3 below.

2. *Storm-Normalization Method*

MP stated that the IEEE 2.5 beta method was used to exclude major events from calculations of reliability indices in 2017. This method allows the Company to better reveal trends in their normal operation that would otherwise be obscured by the large statistical effect of Major Event Days (MEDs). The Company noted that, using this method, three major events were excluded from the data used to calculate SAIDI, SAIFI, and CAIDI in 2017.

The Department acknowledges MP's fulfillment of the requirements of Minnesota Rules, part 7826.0500, subp. 1D.

3. *Action Plan to Improve Reliability*

MP did not meet the reliability standard established for SAIDI, SAIFI, or CAIDI in 2017. The Company identified weather and equipment failure as the primary reasons for not meeting the SAIDI and CAIDI goals.

² For ease of reference, the Department attaches to these comments Minnesota Rules, Chapter 7826. Minnesota Rules, part 7826.0200 defines SAIDI, SAIFI and CAIDI. The Department also notes that the three indices are mathematically related: SAIDI / SAIFI = CAIDI

The Company hired two Assistant Engineers, who are working on various distribution equipment maintenance and replacement programs. In 2017, they implemented a new “trouble order tracking and remediation system” as well as a “switch replacement blanket.” They began working on an audit of the Company’s distribution assets, which will be fully developed in 2018.

4. *Bulk Power Supply Interruptions*

MP reported that there were five events in 2017 resulting in an interruption of a bulk power supply facility. MP’s descriptions of the outages include the corrective actions taken to minimize outages and restore service.

5. *Major Service Interruptions*

MP stated that there were 33 Distribution System Status Outage Notification reports in 2017 filed under Minnesota Rules, part 7826.0700. The Company provided copies of the reports; the Department provides the following summary.

2017 – 30 Reports – Reports were fairly evenly distributed throughout the calendar year, compared with prior years in which large percentages of reports were due to singular weather events. As noted above, MP indicated that a majority of 2017 outages were due to equipment failure or weather-related events. MP reported one planned outage and three outages in which the cause was unknown. The three longest outages were due to a singular weather event that took place on December 27, 2017; the longest of the three outages lasted 402 minutes (6 hours, 42 minutes) and affected 1,234 customers in Denhem, MN. This compares favorably with 2015 and 2016, in which the longest outages lasted 3 days, 8 hours, and 5 days, 4 hours, respectively.³ In 2017, the greatest number of customers impacted by one outage took place in Duluth on February 23, 2017, with 2,770 customers impacted for a duration of 96 minutes.

³ However, it appears that the outages resulting from the July 2016 storms caused MP to request help from the Midwest Mutual Assistance Group, which provides cooperation between utilities to provide labor and vehicles to utilities unlikely to restore power to all customers within 4 to 7 days. Since other Minnesota utilities were unable to provide help due to their own storm cleanups, MP had to request aid from as far away as Missouri. In a majority of 2015 and 2016 cases, power was restored within one to three hours.

The Department acknowledges MP's fulfillment of the requirements of Minnesota rules, part 7826.0500, subp. 1G.

6. Worst Performing Circuit

Rather than identifying just one circuit, MP identified its four worst performing feeders – two urban and two rural. These were: Nisswa 2 (urban), Colbyville 242 (urban), Nisswa Pumping Station (rural) and Denham 6431 (rural). For each feeder, the Company detailed the causes of the poor performance and the actions planned or completed to improve the performance of these circuits.

The Department uses historical data to identify potential areas of concerns regarding any feeders that appear multiple times as a worst performing feeder. After reviewing ten years of historical data, the Department notes although two of the identified circuits (Colbyville 242 and Nisswa Pumping Station) have each been identified once before in the past ten years - Colbyville 242 was identified in 2013 and Nisswa Pumping Station in 2010. The outages were due largely to weather events and equipment failure, with one outage due to a vehicle accident, and one outage due to overloading a feeder. MP stated that it has addressed the equipment failure issues by replacing the problematic equipment, and has worked with its engineers to avoid future feeder overload on the Denham 6431 circuit. Finally, the Company noted that one outage on the Colbyville 242 circuit was longer than it should have been because the failed equipment was in a difficult to access location; MP ensured that right-of-way crews cleared the area for easier future access. Overall, the Department concludes that there is no concern with any specific feeder at this time.

The Department acknowledges MP's fulfillment of the requirements of Minnesota rules, part 7826.0500, subp. 1H.

7. Compliance with ANSI Voltage Standards

MP reported eleven instances in 2017 in which nominal electric service voltages did not meet the standards of ANSI Voltage Range B. This is higher than historical numbers, but lower than numbers reported in 2015 and 2016. Between 2008 and 2014, there were on average 4 instances annually, whereas the Company reported 21 instances in 2015 and 20 instances in 2016. MP stated, as it did in both the 2015 and 2016 Reports:

[The Company] continued to experience large turnover in its service dispatch department in 2017. [...] The Company's process for recording and tracking ANSI voltage violations has improved but MP is still working on the best solution to record and store this data. The current method is to record violations in a separate field on the trouble orders within the Outage Management System. That

being said, there is an existing process employees complete on paper that captures the voltage recordings that are on the MP side of the meter, which would possibly rule out some of the reported incidents in 2017 as being customer-related non-reportable events.

The Company also noted that it hired three new dispatchers in 2017.

The Department acknowledges MP's fulfillment of the requirements of Minnesota Rules, part 7826.0500, subp. 1I.

8. Work Center Staffing Levels

MP reported that there were 114 full-time equivalent field employee positions in 2017, 98 of which are responsible for responding to trouble and for the operation and maintenance of distribution lines. The number of employee positions reported by MP in the past has ranged from 100 to 114.

The Department acknowledges MP's fulfillment of the requirements of Minnesota Rules, part 7825.0500, subp. 1J.

9. Other Information

MP noted that it had no additional information to report at this time.

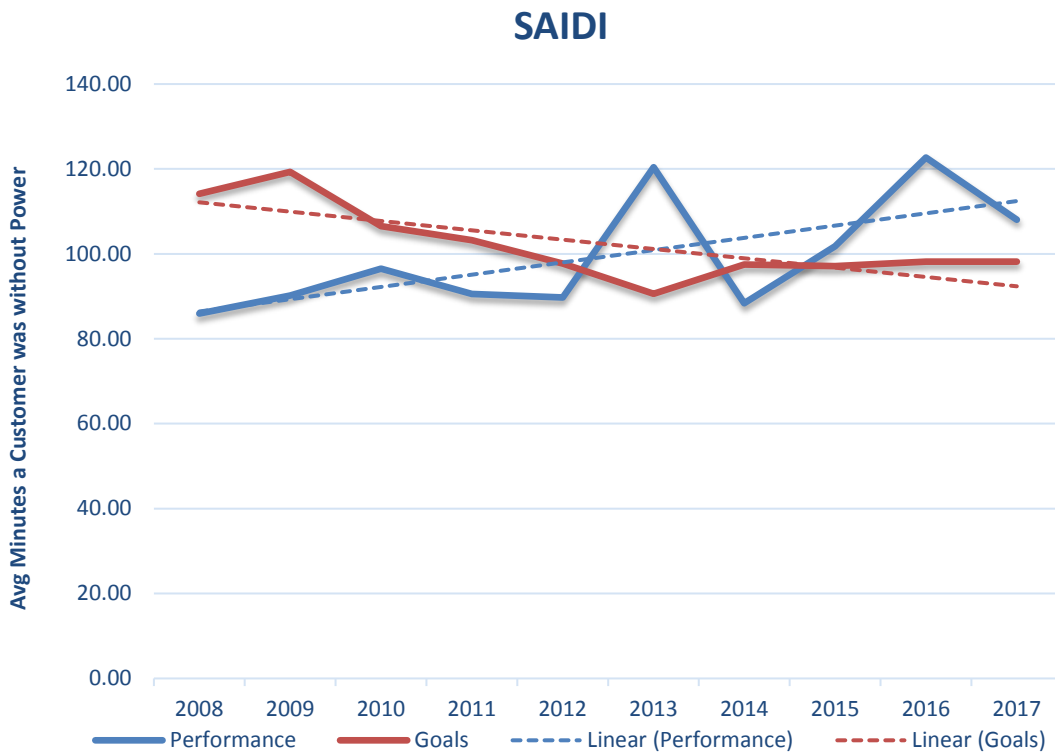
C. PROPOSED RELIABILITY STANDARDS FOR 2018

MP proposed the following reliability goals for 2018:

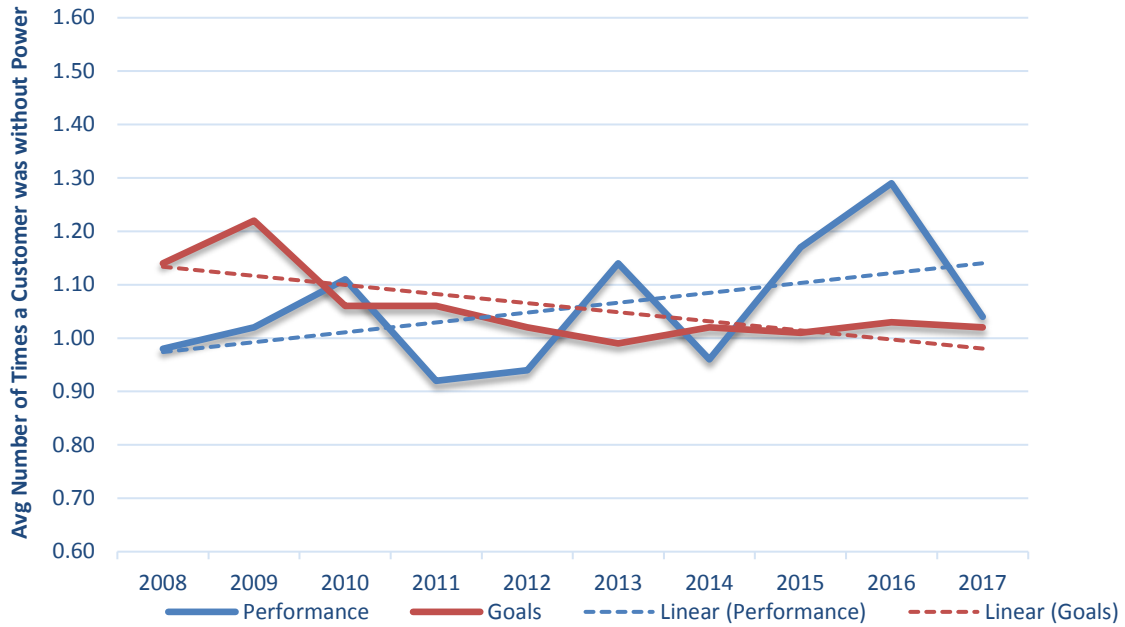
- SAIDI = 108.27
- SAIFI = 1.12
- CAIDI = 96.67

These goals reflect an average of MP's previous five years of actual performance. As a result of MP failing to meet the SAIDI and SAIFI standards in 2015 and 2016, the Department notes that these proposed goals are slightly higher (*i.e.* easier to achieve) than those set for 2017.

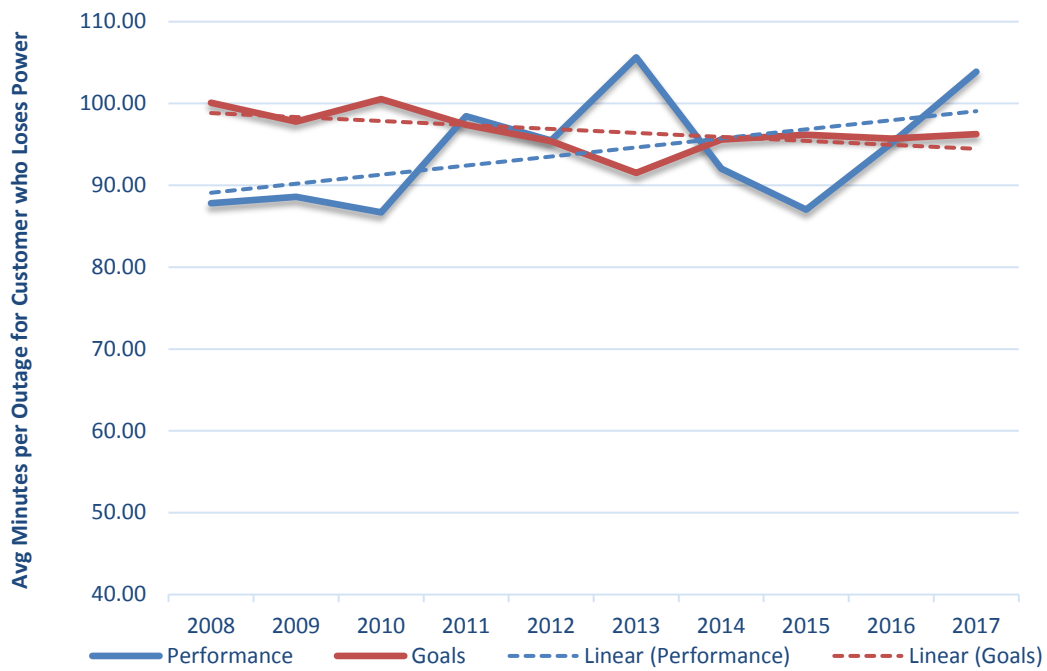
As can be seen in the figures below, the Company's performance trend line goes up, indicating worsening performance over the past ten years. The Department notes that the goals set have placed slight pressure on the Company to improve performance, but have stabilized in recent years. Given the Company's efforts to improve distribution system reliability, and MP's expectation that improvements will be seen in 2018, the Department recommends that the Commission maintain the SAIDI, SAIFI, and CAIDI goals at 2017 levels.



SAIFI



CAIDI



D. ANNUAL SERVICE QUALITY REPORT

Minnesota Rules, part 7826.1300 requires each utility to file the following information:

1. Meter Reading Performance (7826.1400),
2. Involuntary Disconnection (7826.1500),
3. Service Extension Response Time (7826.1600),
4. Call Center Response Time (7826.1700),
5. Emergency Medical Accounts (7826.1800),
6. Customer Deposits (7826.1900), and
7. Customer Complaints (7826.2000).

1. Meter Reading Performance

The following information is required for reporting on monthly meter reading performance by customer class:

- 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 6 to 12 months and for periods of longer than 12 months;
- D. data on monthly meter reading staffing levels, by work center or geographical area.

MP reported that in 2017, the Company read 98.63 percent of residential meters, 99.3 percent of commercial meters, and 100 percent of industrial, municipal pumping, and lighting meters. Minnesota Rules, part 7826.0900, subp. 1 requires that at least 90 percent of all meters are read monthly from April through November and that at least 80 percent of all meters are read monthly from December through March. MP's information reflects that this standard has been met.

MP reported maintaining an average of 7.5 full-time equivalent monthly meter reading staff in 2017.

The following table summarizes the number of service points not read in one year or more according to MP's past ten annual reports.

Table 5: Meters Not Read

	Company Read		Customer Read	
	12 months	+12 months	12 months	+12 months
2008	1	8	0	0
2009	1	32	0	1
2010	0	0	0	1
2011	0	3	1	3
2012	7	3	1	3
2013	2	14	0	1
2014	4	8	0	0
2015	2	5	0	0
2016	6	12	1	0
2017	0	0	0	0

In 2017, MP was successful in ensuring that each meter was read at least once.

The Department acknowledges MP's fulfillment of the requirements of Minnesota Rules, part 7826.1400 and the Company's achievement of the standard set in Minnesota Rules, part 7826.0900, subp. 1.

2. *Involuntary Disconnections*

The following information is required for reporting on involuntary disconnection of service by customer class and calendar month:

- A. the number of customers who received disconnection notices;
- B. the number of customers who sought cold weather rule (CWR) protection under Chapter 7820 and the number of customers 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 into a payment plan.

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

Table 6: Residential Customer Involuntary Disconnection Information

	Received Disconnect Notice	Sought CWR Protection	% Granted	Disconnected Involuntarily	Restored within 24 Hours	Restored by Entering Payment Plan
2008	33,889	1,746	100%	3,293	1,774	204
2009	33,129	1,429	100%	3,229	1,723	311
2010	35,526	1,698	100%	2,853	1,481	297
2011	37,647	3,465	99%	3,009	1,804	331
2012	37,837	3,227	99.8%	3,518	1,828	569
2013	40,451	2,617	99.8%	3,171	1,122	576
2014	35,796	2,852	100%	3,257	799	443
2015	22,537	2,173	100%	520	154	56
2016	12,191	2,916	100%	1,933	213	634
2017	17,454	3,475	100%	2,668	1,284	1,680

The Department addresses the increase in the “Restored by Entering Payment Plan” below in Section III below.

The Department acknowledges MP’s fulfillment of the requirements of Minnesota Rules, part 7826.1500.

3. Service Extension Requests

The following information is required for reporting on service extension request response times⁴ by customer class and 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 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.

⁴ MP measures service extension request response times as the interval between the date service was installed and the requested service date, even in cases where the requested service date cannot be met due to a delay caused by the customer.

Table 7: New Service Extension Requests: Combined Residential, Commercial, and Industrial

	Total Number of Installations	Request Date Met	% Request Date Met
2010	712	484	68.0%
2011	603	420	69.7%
2012	653	476	72.9%
2013	794	614	77.3%
2014	857	618	72.1%
2015	1,800	1,070	59.4%
2016	1,476	835	56.6%
2017	1,747	1,338	76.6%

For 2017, MP reported that 1,747 customers requested service to a location not previously served, an 18 percent increase in requests from 2015. New installations are above the average of 1,116 for the 5-year period between 2012 and 2016. Approximately 77 percent for 2017 were connected by the date requested. For those that were not, the most common reason was “dates not updated for project,” “Minnesota Power delay due to work load,” and “customer not ready.”

Table 8: Previously Served Customer Service Extension Requests: Combined Residential, Commercial, and Industrial

	Total Number of Installations	Request Date Met	% Request Date Met
2010	2,329	2,057	88.3%
2011	2,453	2,198	89.6%
2012	2,526	2,389	94.6%
2013	2,305	2,097	91.0%
2014	2,375	2,216	93.3%
2015	1,671	1,396	83.5%
2016	2,652	2,463	92.9%
2017	4,563	4,032	88.4%

For locations that previously had service, MP reported a 72 percent increase in the total number of service requests from 2016 to 2017, as well as a 5 percent decline in the percentage of service extensions met by the request date.

The Department acknowledges that MP provided the information required by Minnesota Rules, part 7826.1600.

4. *Call Center Response Time*

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 interruptions. Minnesota Rules, part 7826.1200 requires utilities to answer 80 percent of calls made to the business office during regular business hours and 80 percent of all outage calls within 20 seconds.

In response to an email from the Department, the Company stated that it received 145,688 calls during business hours (7:00 am to 5:30 pm) and 14,206 calls after business hours (5:30 pm to 7:00 am) to the Company's Interactive Voice Response (IVR) unit.⁵ The Company stated that, on an annual average, 82.4 percent of all calls received during business hours were answered within 20 seconds and 65.9 percent of calls received after business hours were answered within 20 seconds. Calls routed to outage reporting are handled immediately through an automated system. Although the Company can determine the number of calls by call category (e.g. service interruption), MP is unable to track response time by contact type.

In 2017, Minnesota Power reported that the Company "hired two additional Call Center representatives, created a new quality assurance position and program to increase direct coaching for each representative, increased the number of representatives on staff during the last business hours of the day, and adjusted its storm call-out practices to get more representatives on the phone faster at the onset of outages."⁶

The Department concludes that MP complied with the call response time standard set forth in Minnesota Rules, part 7826.1200 in 2017.

The Department acknowledges that MP has fulfilled the requirements of Minnesota Rules, part 7826.1700.

5. *Emergency Medical Accounts*

The reporting on emergency medical accounts must include the number of customers who requested emergency medical account status under Minnesota Statutes, section 216B.098, subd. 5, the number of requests granted, and the number denied, including the reasons for each denial.

⁵ All calls to Minnesota Power are routed through its IVR unit.

⁶ Filing, page 40.

MP reported that 146 customers in 2017 requested emergency medical account status; 142 of these requests were granted. Of those who were denied, three did not provide proper documentation and did not respond to the Company's outreach attempts. The fourth customer was denied because their diagnosis (bronchitis) was not considered to be a medical emergency per Company policy.

The Department acknowledges MP's fulfillment of the requirements of Minnesota Rules, part 7826.1800.

6. *Customer Deposits*

The reporting on customer deposits must include the number of customers who were required to make a deposit as a condition of receiving service.

MP reported that it refunded all deposits in 2014. MP stated that collection of deposits will be reconsidered in the future. No deposits were required in 2017. The number of deposits required by MP over the past eleven years are shown in Table 9 below.

Table 9: MP's Required Deposits

Year	Residential	Commercial	Total
2006	153	1	154
2007	5	0	5
2008	74	1	75
2009	161	21	182
2010	190	24	214
2011	222	10	232
2012	315	1	316
2013	326	11	337
2014	-	-	-
2015	0	0	0
2016	0	0	0
2017	0	0	0

The Department acknowledges MP's fulfillment of the requirements of Minnesota Rules, part 7826.1900.

7. *Customer Complaints*

The reporting on customer complaints must include the following information by customer class and calendar month:

- 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.

MP reported monthly information showing that a total of 56 commercial and 641 residential customer complaints were received in 2017. The most frequent category of complaint was "high bill complaint," which amounted to 77.47 percent of all complaints. MP reported that 93 percent of the residential complaints were resolved upon initial inquiry. The Company also reported that 53 percent of resolved residential complaints were done so by explaining that the situation complained of was not reasonably within the control of Minnesota Power. Table 10 below shows the historical number of complaints received by the Company for the last ten years.

Table 10: Summary Complaint Totals

Year	Commercial	Residential	Industrial	Total
2008	96	1,582	0	1,678
2009	137	1,534	0	1,671
2010	141	1,585	0	1,726
2011	76	1,178	0	1,254
2012	81	780	0	861
2013	63	663	0	726
2014	64	1,045	0	1,109
2015	27	540	0	567
2016	46	388	0	434
2017	56	641	0	697

The number of complaints forwarded to the Company by the Commission's Consumer Affairs Office in 2017 was slightly higher than the previous years' average of 11.9. Table 11 shows the number of complaints forwarded to the Company by the Commission's Consumer Affairs Office (CAO) over the past ten years.

Table 11: Complaints Forwarded by the CAO

Year	# of Complaints
2008	10
2009	4
2010	15
2011	10
2012	9
2013	11
2014	13
2015	13
2016	22
2017	14

The Department acknowledges MP's fulfillment of the requirements of Minnesota Rules, part 7826.2000.

III. PROPOSED RECONNECT PILOT PROGRAM

A. BACKGROUND

Minnesota Power included in its filing a proposal for a Reconnect Pilot Program, which, if certain requirements are met, permits disconnected customers to be remotely re-connected at a reduced rate during non-business hours. The program was initially proposed in the Company's last rate case, E015/GR-16-664, but the Commission did not accept or reject the proposed pilot. However, the Commission provided guidance that the Company should resubmit the proposal in this 2018 Annual Safety, Reliability and Service Quality Report.

In the course of rate case, three parties submitted testimony in regards to the Reconnect Pilot: Minnesota Power, the Department, and the Energy CENTS Coalition (Energy CENTS or ECC). In its initial proposal, Minnesota Power stated that approximately 200 residential customers with advanced metering infrastructure who have been disconnected for nonpayment in the past could be identified and given metering configuration that would enable remote reconnections, which could occur after normal business hours or on weekends or holidays, for \$20.00 per reconnection. (See Koecher Direct at pages 19-23.)

The Department was not opposed to the Company's proposal, but recommended that Minnesota Power provide compliance filings detailing the amount of money saved from this program. The Company was amenable to this suggestion and suggested that compliance filings could be made annually in the Service Quality Annual Reports.

Energy CENTS was opposed to the program. The primary concern of Energy CENTS was that this program would undermine consumer protections (Marshall Direct). Energy CENTS suggested that instead, the Company should focus on reducing the number of disconnections in the first place, and reconnecting customers in a more expeditious manner. To these last points, the Department responded that while reducing the number of disconnections is a good goal, the pilot would not be a barrier to pursuing that goal. Further, the proposed pilot would save customers money through lower reconnection fees and lowers MP's reconnection costs.

The Administrative Law Judge found the Company's proposal to be just and reasonable, and recommended implementation. However, the Commission disagreed, and determined that the ALJ did not adequately address the concerns of Energy CENTS. As was mentioned previously, the Commission declined to make a ruling either accepting or rejecting the program.

B. DEPARTMENT ANALYSIS

Minnesota Power does not appear to have materially changed the proposed program from that which was proposed in the rate case. Under the Company's Reconnect Pilot, customers would have the option to be reconnected using remote Advanced Metering Infrastructure capabilities at a lowered cost during non-business hours. Currently, the charge to reconnect a customer in person during non-business hours is \$100; the Company proposed to charge \$20 for a remote reconnection, which is the same charge as a business hour in-person reconnection. Customers who are remotely reconnected would be walked through the process on the phone to ensure that the reconnection has taken place.

Minnesota Power stated that the proposal would result in timelier reconnections, would be safer for field employees, and would use technology to streamline services and lower Company and customer costs.

The Department continues to support the Company's proposed Reconnect Pilot. The Department agrees that the lowered cost to both customers and the Company, the increase in safety and reduced wear and tear of equipment, and the prospect of timelier reconnections are important benefits that could eventually be expanded to more customers.

However, the Department also agrees with the Commission's finding that the concerns raised by Energy CENTS during the rate case proceeding have not been adequately addressed. To this end, the Department provides the following analysis on three particular issues raised by Energy CENTS: that Minnesota Power does not appear to be working sufficiently with customers to

create payment arrangements for service reconnection; that the proposed program appears to disproportionately target low-income customers; and that remote reconnection appears to necessitate remote disconnection.

During the rate case proceeding, ENERGY CENTS was skeptical that the Company offers a sufficient number of customers a payment arrangement in order to reconnect service. The following table shows the Company's history in terms of payment plan offerings to customers disconnected for nonpayment.

Table 12: Use of Payment Plans to Restore Service to Disconnected Customers

Year	Customers Disconnected	Customers Restored by Entering Payment Plan	Percentage of Customers Restored by Entering Payment Plan
2003	2010	120	6.0
2004	2042	41	2.0
2005	2279	64	2.8
2006	2315	83	3.6
2007	3038	171	5.6
2008	3293	204	6.2
2009	3229	311	9.6
2010	2853	297	10.4
2011	3009	331	11.0
2012	3518	569	16.2
2013	3171	576	18.2
2014	3257	443	13.6
2015	520	56	10.8
2016	1933	634	32.8
2017	2668	1680	63.0

It appears that in the time since the rate case, the Company's record on this has improved. However, the Company does note in the instant filing that prior to 2017, there were not uniform practices in terms of how this data was recorded. These data discrepancies were partially due to the dates recorded, partially due to one customer moving out and another moving in at the same location, and appear to largely be due to the new practice of including customers entering payment plans in Cold Weather Rule (CWR) months. The Company stated in Appendix A, Page 30: "Also, in months where a disconnection occurred with a payment plan created under CWR in that same month, disconnections were not included in previous counts. During times when the CWR applies, a customer may be reconnected if they enter into a payment plan." Therefore, it is unclear to the Department whether the Company has actually

been improving in its attempts to enter into payment plans with disconnected customers, or whether the Company's numbers improved simply because MP is now classifying more customers (those entering payment plans in CWR months) as "Customers Entering into Payment Plan."

The Department notes, however, that Energy CENTS was particularly concerned about the Company working to establish payment plans outside of those seeking Cold Weather Rule protection. The ECC witness stated: "I urge the Commission to determine whether the Company actually offers payment arrangements to past-due customers, outside of the CWR period, before providing the Company with an additional tool for more easily disconnecting even more customers from essential electric service." (Marshall Surrebuttal, page 21). The Department requests that in Reply Comments, the Company describe MP's approach to offering payment plans outside the CWR months, detail challenges to restoring power via payment plans, and explain how the Company intends to address these challenges going forward.

Energy CENTS also expressed concerns that the proposed pilot program is discriminatory in nature, as targeting customers with frequent disconnections means that the Company will inevitably be targeting low-income customers for program participation. The Company has justified only extending the program to some customers because it has specified that there is an increased cost to add remote capabilities to AMI. Therefore, the Company wishes to focus on those customers who are more likely to justify the higher cost by needing reconnecting more frequently. The Department understands the importance of deploying emerging technologies in a cost effective manner, but also can appreciate that it might be appropriate to have some type of control group in the pilot program. The Department further notes that the incremental cost of adding remote capabilities to AMI appears to be decreasing. The Company stated in the current docket that there is a 28 percent increase in cost to add remote capabilities, which compares favorably to the 42 percent increase in cost stated by the Company during the rate case. Given that it not as cost prohibitive as it once was to add remote capabilities to AMI, the Department requests that in Reply Comments, the Company comment upon whether it may be useful to extend the program to a control group of non-low-income customers.

The Department notes that while the Company has focused primarily on the ease of reconnecting customers, MP has not sufficiently addressed Energy CENTS' point that this program also means there is an ease in disconnecting customers, which is a top concern of Energy CENTS. The Company stated that it will comply with all existing Minnesota statutes concerning disconnection. The Department notes, however, that Minnesota Rules, part 7820.2500 requires that staff personnel be in place at the time of disconnection. Therefore, approval of the proposed pilot would require a variance to this rule. The Company also stated that "[i]n order for remote connection to work, a remote disconnection signal would have to

have been sent to the meter.”⁷ It is not clear to the Department why a remote disconnection signal is needed, given that the proposed pilot is described in terms of reconnections only. The Department asks that the Company explain the need for remote disconnection signals in Reply Comments.

Finally, while this was not a concern raised by either the Department or Energy CENTS during the rate case proceeding, the Department has concerns about the reconnection fees in general. The Department questions whether a remote reconnection fee during non-business hours would cost the same as any business hour reconnection fee, whether remote or in-person. It is logical to assume that a remote reconnection would be more cost effective during both business hours and non-business hours; therefore, it would logically follow that a remote reconnection during business hours should be less than \$20. Further, while the Company stated during the rate case proceeding that neither the costs nor savings associated with the proposed Reconnect Pilot Program were included in the test year, the Department would like to verify that the reconnection cost savings associated with the proposed pilot are properly reflected in the pilot’s reconnect fee. Therefore, the Department asks that the Company submit a cost study detailing the costs of the four available reconnections: remote during business hours, remote during non-business hours, in-person during business hours, and in-person during non-business hours.

The Department will make a final recommendation concerning the Company’s proposed Reconnect Pilot in Reply Comments.

C. TARIFF SHEETS

Commission approval of the Reconnect Pilot Program would involve changes to the Company’s tariff, specifically, Section VI, page 3.5, Regulation 20.A. Minnesota Power has provided both redline and clean versions of the changes. The section is proposed to be amended to read:

20. Reconnection of Service: Company shall reconnect service following disconnection for non-payment only after all past due accounts, deposits and reconnection fees, where applicable, shall have been paid.

A. The Service Reconnection Fee shall be as follows:

- i. \$20.00 between the hours of 8:00 AM and 4:30 PM Monday through Friday
- ii. \$100.00 after 4:30 PM, before 8:00 AM and on Saturdays, Sundays and legal holidays, however, customer with remote technology who has met payment requirements and desires to be

⁷ Filing, Page 37.

reconnected after hours shall pay a Service
Reconnection Fee of \$20.00.

The Department is concerned that inserting the pilot language into the universal tariff in this way might be confusing to customers. For example, customers who may not be eligible for the Reconnect Pilot could see this language and not understand why they have to pay \$100. Further, this sentence does not help customers understand the nature of the pilot, including eligibility requirements and how a participant's experience may or may not change as a result of opting in. If a customer has a complaint about the program, they do not have a place to turn to within the Company's tariff to understand how they are protected. Finally, it is common for utilities to make a standalone tariff page for pilot programs, as this practice more easily enables utilities to remove the pilot page if there later is a decision to not move forward with the pilot. Therefore, the Department recommends that rather than inserting the proposed language into Section VI, page 3.5, Regulation 20.A, the Company create a new tariff page dedicated to the Reconnect Pilot. The new tariff page should outline, at minimum: reconnection costs, eligibility and selection criteria, opt-out provisions, and disconnection and reconnection procedures.

Finally, the Department notes that the Company has submitted 24 pages of its existing tariff as both redline and clean versions, even though there was only one page that had a proposed substantive change. The Department recommends that the Company only submit redline and clean versions of pages that have actual language changes within the tariff. Therefore, if the Company submits a simple standalone pilot tariff, only the new page, the table of contents page, and the definitions page (if appropriate) should be submitted in redline and clean versions.

D. COMPLIANCE FILINGS

As noted in part above, the Department recommends that, should the pilot be approved, the Commission require MP to submit annual compliance filings detailing the costs, and cost savings realized from the Pilot, both from the Company's and the customers' perspectives. Reports may include figures such as how many customers were chosen for the pilot, whether anyone asked to stop participating, and the number and nature of any complaints. The Department does not object to MP submitting these compliance filings in the annual service quality reports.

IV. CONCLUSION AND RECOMMENDATION

The Department requests that in Reply Comments, the Company:

- detail challenges to restoring power via payment plans describe MP's approach to offering payment plans outside the CWR months, and explain how the Company intends to address these challenges going forward;
- comment upon whether it may be useful to extend the Reconnect Pilot Program to a control group of non-low-income customers;
- comment upon why a remote disconnection signal is needed in order to have a remote reconnection;
- provide support for a variance to Minnesota Rules, part 7820.2500 that would be required in order to implement the Reconnect Pilot Program;
- submit a cost study detailing the costs of the four available reconnections: remote during business hours, remote during non-business hours, in-person during business hours, and in-person during non-business hours; and
- remove the proposed tariff change language from Section VI, page 3.5, Regulation 20.A and create a new standalone tariff page dedicated to the Reconnect Pilot. The new tariff page should outline, at minimum: reconnection costs, eligibility and selection criteria, opt-out provisions, and disconnection and reconnection procedures.

The Department recommends that the Commission accept Minnesota Power's 2017 Report in fulfillment of the requirements of Minnesota Rules, Chapter 7826 and the Commission's September 15, 2017 Order.

Additionally, the Department recommends that the Commission set the Company's reliability standards for 2018 at the levels set for 2017:

- SAIDI = 98.19
- SAIFI = 1.02
- CAIDI = 96.26

/ja

CHAPTER 7826
PUBLIC UTILITIES COMMISSION
ELECTRIC UTILITY STANDARDS

7826.0100 APPLICABILITY.

7826.0200 DEFINITIONS.

SAFETY

7826.0300 SAFETY STANDARDS.

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7826.1400 REPORTING METER-READING PERFORMANCE.

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7826.1700 REPORTING CALL CENTER RESPONSE TIMES.

7826.1800 REPORTING EMERGENCY MEDICAL ACCOUNT STATUS.

7826.1900 REPORTING CUSTOMER DEPOSITS.

7826.2000 REPORTING CUSTOMER COMPLAINTS.

7826.0100 APPLICABILITY.

This chapter applies to all persons, corporations, or other legal entities engaged in the retail distribution of electric service to the public, with the following exceptions:

- A. cooperative electric associations;
- B. municipal utilities;
- C. persons distributing electricity only to tenants or cooperative or condominium owners in buildings owned, leased, or operated by those persons;
- D. persons distributing electricity only to occupants of a manufactured home or trailer park owned, leased, or operated by those persons; and
- E. persons distributing electricity to fewer than 25 persons.

7826.0200 ELECTRIC UTILITY STANDARDS

Statutory Authority: *MS s 216B.81*

History: *27 SR 1174*

Published Electronically: *February 13, 2003*

7826.0200 DEFINITIONS.

Subpart 1. **Scope.** The terms used in this chapter have the meanings given them in this part.

Subp. 2. **Bulk power supply facility.** "Bulk power supply facility" means 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.

Subp. 3. **Cold weather rule.** "Cold weather rule" means the set of protections against disconnection during the heating season set forth in Minnesota Statutes, sections 216B.096 and 216B.097.

Subp. 4. **Customer average interruption duration index or CAIDI.** "Customer average interruption duration index" or "CAIDI" means the average customer-minutes of interruption per customer interruption. It approximates the average length of time required to complete service restoration. It is determined by dividing the annual sum of all customer-minutes of interruption durations by the annual number of customer interruptions, using storm-normalized data.

Subp. 5. **Customer complaint.** "Customer complaint" means any call center communication by a utility customer in which the customer states a grievance related to the utility's provision of service to that customer.

Subp. 6. **Interruption.** "Interruption" means an interruption of service to a customer with a duration greater than five minutes.

Subp. 7. **Major service interruption.** "Major service interruption" means an interruption of service at the feeder level or above and affecting 500 or more customers for one or more hours.

Subp. 8. **Resolved.** "Resolved," used in regard to customer complaints, means that the utility has examined the complainant's claims, conducted any necessary investigation, and done one of the following:

- A. taken the action the customer requests;
- B. taken an action the customer and the utility agree is an acceptable compromise;
- C. provided the customer with information that demonstrates that the situation complained of is not reasonably within the control of the utility; or
- D. refused to take the action the customer requested and communicated that refusal to the customer.

Subp. 9. **Storm-normalized data.** "Storm-normalized data" means data that has been adjusted to neutralize the effects of outages due to major storms.

Subp. 10. **System average interruption duration index or SAIDI.** "System average interruption duration index" or "SAIDI" means the average customer-minutes of interruption per customer. It is determined by dividing the annual sum of customer-minutes of interruption by the average number of customers served during the year, using storm-normalized data.

Subp. 11. **System average interruption frequency index or SAIFI.** "System average interruption frequency index" or "SAIFI" means the average number of interruptions per customer per year. It is determined by dividing the total annual number of customer interruptions by the average number of customers served during the year, using storm-normalized data.

Subp. 12. **Utility.** "Utility" means any person, corporation, or other legal entity engaged in the retail distribution of electric service to the public, with the following exceptions:

- A. cooperative electric associations;
- B. municipal utilities;
- C. persons distributing electricity only to tenants or cooperative or condominium owners in buildings owned, leased, or operated by those persons;
- D. persons distributing electricity only to occupants of a manufactured home or trailer park owned, leased, or operated by those persons; and
- E. persons distributing electricity to fewer than 25 persons.

Subp. 13. **Work center.** "Work center" means a portion of a utility's assigned service area that it treats as an administrative subdivision for purposes of maintaining and repairing its distribution system.

Statutory Authority: *MS s 216B.81*

History: *27 SR 1174; L 2009 c 110 s 37*

Published Electronically: *June 2, 2009*

SAFETY

7826.0300 SAFETY STANDARDS.

Subpart 1. **National Electrical Safety Code.** When constructing new facilities or reinvesting capital in existing facilities, utilities shall comply with the requirements stated at the time the work is done in the then most recently published edition of the National Electrical Safety Code, as published by the Institute of Electrical and Electronics Engineers, Inc. and approved by the American National Standards Institute. This code is incorporated by reference, is not subject to frequent change, and is conveniently available to the public through the statewide interlibrary loan system.

Subp. 2. **Standards and recommended practices of the Institute of Electrical and Electronics Engineers, Inc. and the American National Standards Institute.** Utilities are encouraged to follow the recommended practices of the Institute of Electrical and Electronics Engineers, Inc. and the American National Standards Institute on electricity metering and standard voltage ratings for electric power systems and equipment. Utility compliance with these recommended practices creates a rebuttable presumption that a practice is reasonable.

Subp. 3. **Occupational Safety and Health Administration rules.** When constructing, installing, refurbishing, or maintaining facilities, utilities shall comply with all regulations promulgated by the United States Occupational Safety and Health Administration and by the Occupational Safety and Health Division of the Minnesota Department of Labor and Industry.

7826.0500 ELECTRIC UTILITY STANDARDS

Statutory Authority: *MS s 216B.81*

History: *27 SR 1174*

Published Electronically: *February 13, 2003*

7826.0400 ANNUAL SAFETY REPORT.

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

A. summaries of all reports filed with the United States Occupational Safety and Health Administration and the Occupational Safety and Health Division of the Minnesota Department of Labor and Industry during the calendar year; and

B. a description of all incidents during the calendar year in which an injury requiring medical attention or property damage resulting in compensation occurred as a result of downed wires or other electrical system failures and all remedial action taken as a result of any injuries or property damage described.

Statutory Authority: *MS s 216B.81*

History: *27 SR 1174*

Published Electronically: *February 13, 2003*

RELIABILITY

7826.0500 RELIABILITY REPORTING REQUIREMENTS.

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;

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

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;

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;

G. a copy of each report filed under part 7826.0700;

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;

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

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; and

K. any other information the utility considers relevant in evaluating its reliability performance over the calendar year.

Subp. 2. **Initial reporting requirements.** By March 30, 2003, each utility shall file its SAIDI, SAIFI, and CAIDI for each of the past five calendar years, by work center and for its assigned service area as a whole. If this information is not available, the utility shall file an explanation of how it has been tracking reliability for the past five years, together with reliability data for that period of time. If the utility has implemented a new reliability tracking system that makes comparisons between historical data and current data unreliable, the utility shall explain this situation in its filing.

Statutory Authority: *MS s 216B.81*

History: *27 SR 1174*

Published Electronically: *February 13, 2003*

7826.0600 RELIABILITY STANDARDS.

Subpart 1. **Annually proposed individual reliability standards.** On or before April 1 of each year, each utility shall file proposed reliability performance standards in the form of proposed numerical values for the SAIDI, SAIFI, and CAIDI for each of its work centers. These filings shall be treated as "miscellaneous tariff filings" under the commission's rules of practice and procedure, part 7829.0100, subpart 11.

Subp. 2. **Annually set, utility-specific, reliability standards.** The commission shall set reliability performance standards annually for each utility in the form of numerical values for the SAIDI, SAIFI, and CAIDI for each of its work centers. These standards remain in effect until the commission takes final action on a filing proposing new standards or changes them in another proceeding.

Statutory Authority: *MS s 216B.81*

History: *27 SR 1174*

Published Electronically: *February 13, 2003*

7826.0700 REPORTING MAJOR SERVICE INTERRUPTIONS.

Subpart 1. **Contemporaneous reporting.** A utility shall promptly inform the commission's Consumer Affairs Office of any major service interruption. At that time, the utility shall provide the following information, to the extent known:

- A. the location and cause of the interruption;
- B. the number of customers affected;

7826.0900 ELECTRIC UTILITY STANDARDS

- C. the expected duration of the interruption; and
- D. the utility's best estimate of when service will be restored, by geographical area.

Subp. 2. **Written report.** Within 30 days, a utility shall file a written report on any major service interruption in which ten percent or more of its Minnesota customers were out of service for 24 hours or more. This report must include at least a description of:

- A. the steps the utility took to restore service; and
- B. any operational changes the utility has made, is considering, or intends to make, to prevent similar interruptions in the future or to restore service more quickly in the future.

Statutory Authority: *MS s 216B.81*

History: *27 SR 1174*

Published Electronically: *February 13, 2003*

SERVICE

7826.0800 CUSTOMER NOTICE OF PLANNED SERVICE INTERRUPTIONS.

Utilities shall give customers the most effective actual notice possible of any planned service interruption expected to last longer than 20 minutes. For any planned interruption expected to exceed four hours, the utility shall provide, if feasible, mailed notice one week in advance and notice by telephone or door-to-door household visits 12 to 72 hours before the interruption. Planned service interruptions must be scheduled at times to minimize the inconvenience to customers. When planned service interruptions exceeding four hours are canceled, utilities shall notify, if feasible, the customers who received notice that service would be interrupted.

Statutory Authority: *MS s 216B.81*

History: *27 SR 1174*

Published Electronically: *February 13, 2003*

7826.0900 METER READING FREQUENCY; CUSTOMER ACCOMMODATION.

Subpart 1. **Meter reading performance standard.** Utilities shall attempt to read all meters on a monthly basis unless otherwise authorized by the commission. Utilities are assumed to be in compliance with this standard if they read at least 90 percent of all meters during the months of April through November and at least 80 percent of all meters during the months of December through March. Utilities shall contact any customer whose bill has been estimated for two consecutive months and attempt to schedule a meter reading.

Subp. 2. **Evening and weekend meter reading.** Utilities shall read meters during the evening or on Saturday or Sunday for customers whose meters are inaccessible and whose work or other schedule makes meter reading during regular business hours a hardship. When a utility contacts a customer on an individual basis to schedule a meter reading, the utility shall inform the customer of the available alternatives that the utility provides, such as the customer's option to provide a self-read. If alternative arrangements are not acceptable to the customer, the utility shall inform the customer that the utility provides evening and weekend meter reading for customers whose work schedule or other schedule makes meter reading during regular business hours a hardship.

Statutory Authority: *MS s 216B.81*

History: *27 SR 1174*

Published Electronically: *February 13, 2003*

7826.1000 REPLACING MALFUNCTIONING METERS.

Utilities shall replace a malfunctioning meter within ten calendar days of receiving a report from a customer questioning its accuracy or within ten calendar days of learning in some other way that it may be inaccurate.

Statutory Authority: *MS s 216B.81*

History: *27 SR 1174*

Published Electronically: *February 13, 2003*

7826.1100 KEEPING SERVICE CALLS.

Utilities shall keep service call appointments and shall provide as much notice as possible when an appointment cannot be kept. A service call appointment is kept if the worker arrives within a four-hour period set by the utility and clearly communicated to the customer.

Statutory Authority: *MS s 216B.81*

History: *27 SR 1174*

Published Electronically: *February 13, 2003*

7826.1200 CALL CENTER RESPONSE TIME.

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.

7826.1500 ELECTRIC UTILITY STANDARDS

Statutory Authority: *MS s 216B.81*

History: *27 SR 1174*

Published Electronically: *February 13, 2003*

7826.1300 ANNUAL SERVICE QUALITY REPORT FILING.

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.

Statutory Authority: *MS s 216B.81*

History: *27 SR 1174*

Published Electronically: *February 13, 2003*

REPORTING

7826.1400 REPORTING METER-READING PERFORMANCE.

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.

Statutory Authority: *MS s 216B.81*

History: *27 SR 1174*

Published Electronically: *February 13, 2003*

7826.1500 REPORTING INVOLUNTARY DISCONNECTIONS.

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 into a payment plan.

Statutory Authority: *MS s 216B.81*

History: *27 SR 1174; L 2009 c 110 s 37*

Published Electronically: *June 2, 2009*

7826.1600 REPORTING SERVICE EXTENSION REQUEST RESPONSE TIMES.

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 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.

Statutory Authority: *MS s 216B.81*

History: *27 SR 1174*

Published Electronically: *February 13, 2003*

7826.1700 REPORTING CALL CENTER RESPONSE TIMES.

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.

Statutory Authority: *MS s 216B.81*

History: *27 SR 1174*

Published Electronically: *February 13, 2003*

7826.1800 REPORTING EMERGENCY MEDICAL ACCOUNT STATUS.

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, the number whose applications were granted, and the number whose applications were denied and the reasons for each denial.

Statutory Authority: *MS s 216B.81*

History: *27 SR 1174*

Published Electronically: *February 13, 2003*

7826.1900 REPORTING CUSTOMER DEPOSITS.

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

7826.2000 ELECTRIC UTILITY STANDARDS

Statutory Authority: *MS s 216B.81*

History: *27 SR 1174*

Published Electronically: *February 13, 2003*

7826.2000 REPORTING CUSTOMER COMPLAINTS.

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

- 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.

Statutory Authority: *MS s 216B.81*

History: *27 SR 1174*

Published Electronically: *February 13, 2003*

CERTIFICATE OF SERVICE

I, Sharon Ferguson, 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. E015/M-18-250

Dated this 1st day of August 2018

/s/Sharon Ferguson

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1800 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_18-250_M-18-250
Carl	Cronin	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_18-250_M-18-250
Ian	Dobson	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	OFF_SL_18-250_M-18-250
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_18-250_M-18-250
Allen	Krug	allen.krug@xcelenergy.com	Xcel Energy	414 Nicollet Mall-7th fl Minneapolis, MN 55401	Electronic Service	No	OFF_SL_18-250_M-18-250
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_18-250_M-18-250
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_18-250_M-18-250
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_18-250_M-18-250
Susan	Romans	sromans@allete.com	Minnesota Power	30 West Superior Street Legal Dept Duluth, MN 55802	Electronic Service	No	OFF_SL_18-250_M-18-250
Jenna	Warmuth	jwarmuth@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802-2093	Electronic Service	No	OFF_SL_18-250_M-18-250

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_18-250_M-18-250