

June 2, 2022

PUBLIC DOCUMENT

Will Seuffert 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, Division of Energy Resources
Docket No. E002/M-22-162

Dear Mr. Seuffert:

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

2021 Annual Electric Service Quality Report (Report) submitted by Northern States Power Company, d/b/a Xcel Energy (Xcel or the Company).

Xcel filed the Report on April 1, 2022.

The Department recommends the Minnesota Public Utilities Commission (Commission) accept the Company's 2021 Safety Report.

The Department also requests the Company provide information on the following topics in its Reply Comments:

- A comparison of JD Power survey results for 2020 and 2021.
- Explain the 2021 commercial class results for service installation times as compared to 2020.
- Additional information regarding the requirement in Order Point 10 of the Commission's March 2, 2022, Order in Docket No. E002/M-21-237 regarding information provided in the Company's 2021 Electric general rate case.
- A discussion of the drivers for the apparent decrease in the number of website visits and MyAccount and Mobile App Installation interactions as well as Email interactions between 2020 and 2021.
- The process for receiving reliability information in an electronic format as identified in the Commission's December 2, 2021, Order in Docket No. E002/M-21-237.

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The Department also suggests the Commission consider initiating a work group to review and simplify the different reporting requirements included in the 14 or so Commission Orders that cover the information included in Xcel's Service Reliability and Service Quality Report.

As discussed in the attached Comments, the Department provides its responses to the Commission's April 13, 2022 Notice of Comments.

The Department will provide recommendations in Supplemental Comments after reviewing the Company's Reply Comments and the planned Supplemental Filing including the 2021 IEEE Benchmarking Results.

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

Sincerely,

/s/ JOHN KUNDERT
Financial Analyst

JK/ja
Attachment



Before the Minnesota Public Utilities Commission

PUBLIC Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. E002/M-22-162

I. INTRODUCTION

The Minnesota Department of Commerce, Energy Division (Department) appreciates the opportunity to provide comments regarding Northern States Power, d/b/a Xcel Energy's (Xcel, the Company) Annual Compliance with Annual Safety, Reliability, and Service Quality Metrics for 2021.

A. COMMISSION NOTICE AND TOPICS

In its Notice of Comment Period in this proceeding dated April 13, 2022, the Minnesota Public Utilities Commission (Commission) identified four topics that were addressed to the three rate-regulated investor-owned utilities (IOUs) are open for comment.

1. Should the Commission accept Minnesota Power's, Otter Tail Power's, and Xcel Energy's 2021 Safety, Reliability, and Service Quality Metrics reports?
2. Are the utilities' reports consistent with recent Orders and Minnesota Rules 7826 on Electric Utility Standards?
3. At what level should the Commission set the utilities' 2022 Reliability Standards?
4. Are there other issues or concerns related to this matter?

B. PROCEDURAL CONTEXT

Minnesota Rules 7826 were developed as a means for the 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. The rules set forth three main annual reporting requirements:

- The annual safety report (Minnesota Rules 7826.0400).
- The annual reliability report (Minnesota Rules 7826.0500, subp. 1 and 7826.0600, subp. 1); and
- The annual service quality report (Minnesota Rules 7826.1300).

In addition to the rule requirements, the Commission requested additional information in its Orders in various dockets. The Department will respond to the various reporting requirements by Order chronologically.

On April 1, 2022, Xcel filed a petition (Annual Report, Report) to comply with Minnesota Rules 7826 and the Commission's Orders. In that filing, the Company asked the Commission to accept its annual report for 2021 and its proposed 2022 reliability standards.

II. ANALYSIS

The Department's analysis is structured as follows:

1. Section A: Department's response to the Commission's questions.
2. Section B contains our review of Xcel's Safety information under the Commission rules.
3. Section C contains the review of Xcel's Reliability information required by Commission Rules.
4. Section D contains our analysis of Xcel's Service Quality information required by Commission Rules.
5. Section E contains the analysis of information required by Commission Order for both service quality and reliability.

A. RESPONSE TO COMMISSION QUESTIONS

1. *Should the Commission Accept Xcel's 2021 Safety, Reliability and Service Quality Reports?*

The Department recommends the Commission accept the Company's Annual Safety report. The Department is awaiting additional information regarding the Service Quality and Reliability portions of Xcel's 2022 filing before making a recommendation regarding those aspects of the filing. The Company will be supplementing its petition sometime in the fall of 2022. That supplement will include reliability goals developed using the IEEE benchmarking methodology. The Department plans to file supplemental comments regarding its review soon after Xcel files that information.

2. *Is Xcel's 2022 Annual Report consistent with recent Orders and Minnesota Rules 7826 on Electric Utility Standards?*

Yes, the Department's review concludes the Company's report is consistent with the requirements listed in the Commission's question.

3. *At what level should the Commission set Xcel's 2022 Reliability Standards?*

The Commission adopted a new approach for calculating the Company's reliability goals for 2021. The basis for those goals is an annual benchmarking analysis performed by the Institute of Electrical and Electronic Engineers (IEEE) Distribution Reliability Group. The Department recommends the Commission continue the current process for Xcel's 2022 Reliability Standards.

4. *Are there other issues or concerns related to this matter?*

The Department does not have any additional concerns currently.

B. *ANNUAL SAFETY REPORT*

1. *Summary of Minnesota Safety Standards*

Minnesota Rules 7826.0400 requires the utility to file annual safety information including:

- A. Summaries of all reports filed with the U.S. Occupational Safety and Health Administration and the Occupational Safety and Health Division of the Minnesota Department of Labor and Industry for 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 injuries or property damage.

Xcel provided summaries of 2021 data requested by the U.S. Department of Labor. This information reflects safety information on a random selection of the Company's plants and is therefore not necessarily comparable year to year.

2. *2021 Safety Performance*

Table 1 below summarizes Xcel's most recent and past reports regarding property damage claims.¹

¹ Department's calculation based on data provided in Attachment A of the Report.

Table 1: Property Damage Reimbursement 2012 -2021

Year	Claims	Total Amount Paid
2012	88	\$135,836.53
2013	110	\$184,083.70
2014	92	\$137,610.16
2015	90	\$185,584.32
2016	47	\$111,289.98
2017	50	\$135,844.06
2018	79	\$147,754.08
2019	81	\$1,203,379.30
2020	66	\$274,049.00
2021	65	\$178,419.30
10 Yr. Avg	77	\$269,385.04
2021 Variance %	-16%	-34%

The number of claims in 2021 were 16% below the 10-year average. The amount paid in claims in 2021 was 34% below the 10-year average. The amount paid in 2019 was unusually high due to three large claims paid that year.

Based on its review of Xcel's 2021 Safety Report, the Department concludes the Company fulfilled the requirements of Minnesota Rules 7826.0400.

C. ANNUAL SERVICE QUALITY REPORT

Minnesota Rules 7826.1300 requires each utility to file the following information on or before April 1 of each year:²

- Meter Reading Performance (7826.1400).
- Involuntary Disconnection (7826.1500).
- Service Extension Request Response Time (7826.1600).
- Call Center Response Time (7826.1700).
- Emergency Medical Accounts Status (7826.1800).
- Customer Deposits (7826.1900).
- Customer Complaints(7826.2000).

² The Department notes that the Company files combined electric and gas service quality metrics when appropriate (e.g., call center response time, meter reading statistics).

1. *Meter Reading Performance*

The following information is required for reporting on 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 customer.
- C. the number and percentage of customer meters that have not been read by utility personnel for period of 6 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.

An annual average 99.68% of customer meters were read by utility personnel and 0.0003% were read by the customer in 2021.³ This represented a slight decrease in the percentage of customer meters read by utility personnel and a slight increase in the number of customer meters read by customers compared to 2020. These results are consistent with the ongoing difficulties the Company apparently experienced due to supply chain issues among other factors.

Table 2 below summarizes the number of meters not read by utility personnel for 6-12 months, according to Xcel’s past annual and supplemental reports. To provide more context for the 2021 results, the Department also calculated the 10-year average by class and the variance in percentage of the 2021 results from that 10-year average.

Table 2: Meters Not Read for 6-12 Months 2012 - 2021⁴

Year	Residential	Commercial	Industrial	Other	Total
2012	3,967	1,232	248	106	5,553
2013	2,600	822	177	79	3,678
2014	5,237	1,178	260	123	6,798
2015	2,508	942	387	113	3,950
2016	2,268	772	167	75	3,282
2017	1,938	1,118	306	50	3,412
2018	2,313	1,222	489	50	4,074
2019	2,280	1,601	429	61	4,371
2020	1,794	953	386	13	3,146
2021	2,325	809	250	4	3,388
10 Yr. Average	2,723	1,065	310	67	4,165
2021 Variance	-15%	-24%	-19%	-94%	-19%

³ The Department’s calculations are based on data provided in Tables A and B, Attachment C of the Company’s 2021 Report.

⁴ Table C-1, Attachment C of the 2021 Report.

While the number of residential meters not read for 6 to 12 months increased significantly from 2020 in 2021, the 2021 figure was still 14% below the ten-year average for the residential class.

Table 3 below summarizes the number of meters not read by utility personnel for longer than 12 months, according to Xcel's past annual and supplemental reports.

Table 3: Meters Not Read for Longer than 12 Months 2012 – 2021⁵

Year	Residential	Commercial	Industrial	Other	Total
2012	661	450	112	89	1,312
2013	602	335	131	64	1,132
2014	620	304	92	68	1,084
2015	764	310	134	90	1,298
2016	551	240	109	63	963
2017	531	260	135	48	974
2018	580	481	283	44	1,388
2019	574	825	283	50	1,732
2020	773	684	371	40	1,868
2021	639	674	722	20	2,055
10 Yr. Average	630	456	237	58	1,381
2021 Variance	2%	48%	204%	-65%	49%

The results in Table 3 are not very good. The number of commercial meters not read for over a year increased 48%. The same percentage figure for the industrial class was a 204% increase. The Department will continue to monitor this situation in 2022. The Department hopes the 2022 figures are a significant improvement over the 2021 results.

Minnesota Rules 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 its current staffing levels are similar to 2020.⁶

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

2. *Involuntary Disconnections*

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

⁵ Table C-2, Attachment C of the 2021 Report.

- A. the number of customers who received disconnection notices.
- B. the number of customers who sought cold weather rule (CWR) 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.

In 2021, Xcel sent 357,851 disconnection notices to residential customers and 53,953 notices to commercial customers. The Commission ordered suspension of disconnections for residential customers facing financial hardship on August 13, 2020, in Docket No. E,G999/CI-20-375. The Commission then issued an Order on May 26, 2021, allowing for the resumption of disconnections on August 2, 2021. The information for 2020 and 2021 in Table 4 reflect those Commission actions.

A total of 73,027 residential customers sought and received Cold Weather Rule (CWR) protection. Xcel involuntarily disconnected a total of 8,602 residential customers and 135 commercial customers. A total of 3,466 residential customers, or 55%, were restored within 24 hours. The same numbers for the commercial class were 135, 25 and 19%. A total of 3,889 residential and 17 commercial customers had service restored upon entering a payment plan.

Table 4 (following page) summarizes residential customer disconnection statistics Xcel reported in its Annual Report.

The Department developed a three-year average for Table 4 given the change to the data in 2019 noted in footnote 7. While two of the three years included in the average were significantly affected by the COVID-19 pandemic, the average does provide some amount of context.

The number of customers receiving disconnection notices increased in 2021 compared to 2020 as did the number of customers disconnected involuntarily. The number of customers entering into a payment plan also increased significantly.

The Department acknowledges Xcel fulfilled the requirements of Minnesota Rules 7826.1500.

Table 4: Residential Customer Involuntary Disconnection Information 2012 - 2021

Year	Customers Receiving Disconnect Notice	Customers Seeking CWR Protection	Customers Granted CWR Protection	% Granted	Customers Disconnected Involuntarily	Customers Restored within 24 Hours	Customers Restored by Entering Payment Plan
2012	1,207,842	279,713	279,713	100%	27,132	11,010	1,047
2013	1,217,049	126,477	126,477	100%	23,493	9,221	882
2014	1,166,978	105,561	105,561	100%	25,532	10,283	1,250
2015	1,042,775	151,956	151,956	100%	26,756	11,556	1,201
2016	870,665	130,052	130,052	100%	20,574	7,698	1,512
2017	747,409	140,943	140,943	100%	19,212	6,564	1,251
2018	559,011	115,472	115,472	100%	17,337	6,586	1,506
2019 ⁶	521,548	80,713	80,713	100%	16,693	6,318	4,250
2020	222,803	58,225	58,225	100%	2,820	1,610	969
2021	357,851	80,143	80,143	100%	6,292	3,466	3,889
3-year avg.	367,401	73,027	73,027	100%	8,602	3,798	3,036
Var. %	-3%	10%	10%	NA	-27%	-9%	28%

3. Service Extension Requests

The following information is required for reporting on service extension request response times 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.

Xcel stated 212,410 customers requested service to a location previously served in 2021, and the Company responded to all requests by the next business day.⁷Xcel reported 5,346 residential and 218 commercial customers requested service to a location the Company had not previously served in 2021. The average interval between request/readiness date and installation date was 5.7 days for residential and 12.0 days for commercial customers.

⁶ 2019, 2020 and 2021 figures represent Minnesota-only customers. Prior Years included North and South Dakota.

⁷ 2021 Report, p. 8.

The Department looks for any trends in overall response times and inquires as needed. Response times for residential customers in 2021 were 15% lower than the four-year average from 2018 – 2021 while the number of residential installations was 18% higher. The results for commercial customers were not as encouraging. Response times for commercial customers in 2021 were 60% higher than the four-year average from 2018 – 2021 while the number of commercial installations was 47% lower. In last year's Annual Report, Xcel indicated the 2020 Report was the third reflecting service extension request times as tracked by its new Systems, Applications, Processes (SAP) work management system and 2020 was the year the Company improved its installation times. The Department requests Xcel explain the 2021 commercial class results for service installation times in its reply comments.

The Department acknowledges Xcel fulfilled the requirements of Minnesota Rules 7826.1600.

4. *Call Center Response Times*

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 7826.1200, subp. 1 requires utilities to answer 80% of calls made to the business office during regular business hours and 80 percent of all outage calls within 20 seconds. Minnesota Rules 7826.1700 requires utilities to provide information on call center response times and monthly information.

Xcel provided monthly call volume and response time information in Attachment I. In 2021, an average of 79.2% of calls to the Company were answered within 20 seconds.⁸

The Company assumes all calls handled by its Interactive Voice Response (IVR) system are answered within 20 seconds for both calls made during business hours and calls related to service interruptions. For outage calls handled by Xcel's Agents, an average of 51.3% were answered within 20 seconds in 2021. In 2019 and 2020 respectively, the same calculation resulted in 76.8% and 58.9%. The inclusion of Interactive Voice Response outage calls pushed the total outage call percentages for all three years (2019 through 2021) above the 80% threshold.

Xcel provided a lengthy explanation of its efforts to hire and retain call center employees during 2021. The upshot of that discussion is the Company attempted to transition its call center employees to remote work. Absenteeism was a significant issue in 2021 due to COVID. Staff turnover was another significant issue. The Company is attempting to remedy the situation.

⁸ Department's calculations are based on data provided in Attachment F.

The Department acknowledges Xcel fulfilled the requirements of Minnesota Rules 7826.1200 and 7826.1700, subp. 1.

5. *Emergency Medical Accounts*

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

Xcel reported as of March 2022 1,977 Minnesota customers had requested and received Emergency Medical Account status.⁹

In 2021 a higher number of households requested Emergency Medical Account status than 2020, but a slightly lower percentage were granted this status (89.6%).

Table 5 below shows the historical numbers regarding Medical Accounts.

Table 5: Residential Customers Requesting Emergency Medical Account Status 2012 – 2021

Year	Requested Medical Acct. Status	Granted Medical Acct. Status	Percent Granted
2012	1,508	679	45.0%
2013	1,562	832	53.3%
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	90.1%
2020	986	935	94.8%
2021	1,084	971	89.6%
10-year avg	2,207	1,655	75.0%
Variance %	-51%	-41%	

Xcel's numbers for 2021 were significantly lower than the 10-year average. The Company also noted it contacted potential participants with two mailings during 2021 within its service territory.

⁹ This status must be requested and approved annually.

The Department acknowledges Xcel fulfilled the requirements of Minnesota Rules 7826.1800.

6. *Customer Deposits*

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

Table 6 below summarizes the number of accounts for which Xcel reported required deposits. The Department notes the Company requests these deposits from residential customers who have filed for bankruptcy. The 2021 number of deposits required was 11% above the 10-year average.

Table 6: Customer Deposits Required 2012 – 2021

Year	Number of Deposits
2012	622
2013	652
2014	606
2015	561
2016	362
2017	314
2018	394
2019	486
2020	678
2021	583
10 -year Average	526
Variance %	11%

The Department acknowledges Xcel fulfilled the requirements of Minnesota Rules 7826.1900.

7. *Customer Complaints*

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 tendays.

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 (CAO) for further investigation and action.

In 2021, Xcel reported the Company's Customer Advocate Group handled 484 complaints, 257 of which were forwarded by the CAO.¹⁰ The Company provided data showing 10.7% of complaints Xcel's Customer Advocate Group handled in 2021 were resolved upon inquiry.¹¹ The most frequent complaint category was "inadequate service." Xcel reported 31.6% of these complaints in 2021 were resolved by taking the action the customer requested.¹²

Xcel also received 34,346 complaints in 2021 handled upon initial inquiry in the Company's Call Centers. Xcel reported approximately 96.38% of these complaints were resolved by taking the action the customer requested. The complaint category with the largest volume for all customers was "billing errors."

Xcel's report on customer complaints includes the required information. Table 7 contains a limited summary of Xcel's customer complaint history as received through the Company's Customer Advocate Group.

¹⁰ Attachment C of the Report.

¹¹ Id.

¹² Id.

Table 7: Selected Summary of Customer Complaints¹³

Year	Number of Complaints	Adequate Service	Wrongful Disconnect	Billing Error	Resolved Upon Initial Inquiry	Took Action Customer Requested
2010	693	44.90%	21.90%	18.20%	17.00%	29.10%
2011	627	49.10%	17.20%	16.70%	13.20%	28.20%
2012	613	53.50%	19.70%	17.30%	18.60%	27.41%
2013	745	55.80%	15.60%	13.80%	18.90%	38.26%
2014	770	53.20%	19.70%	14.80%	16.80%	51.30%
2015	789	52.50%	23.40%	13.30%	14.30%	29.50%
2016	547	52.10%	19.00%	14.60%	16.30%	32.70%
2017	572	53.50%	24.50%	10.50%	18.00%	27.10%
2018	664	58.10%	18.80%	11.60%	20.60%	26.70%
2019	756	59.70%	17.30%	11.10%	14.00%	26.70%
2020	430	57.20%	3.70%	16.30%	14.40%	35.8%
2021	484	56.61%	7.44%	16.53%	10.7%	31.6%

Given the selective nature of the information included in Table 7, the Department did not develop summary statistics.

The Department acknowledges Xcel fulfilled the requirements of Minnesota Rules 7826.2000.

D. ANNUAL SERVICE RELIABILITY REPORT

Minnesota Rules 7826.0500 requires each utility to file an annual report with the following information:

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

¹³ Id.

1. *Reliability Performance*

Table 8 (following page) shows the Company’s 2021 reliability performance compared with the goals the Commission set in Docket No. E002/M-20-406 using the historical Minnesota Rules-based calculation.

Shaded cells in Table 8 indicate reliability goals the Company did not meet, comparing 2021 actuals to 2020 goals. Thus, Xcel met 7 of the 12 reliability goals identified in the Minnesota Rules approach. This is notable improvement from the Company’s 2020 reliability performance.

While the Department notes this comparison is not required, given the new benchmarking approach the Commission adopted in Docket No. E002/M-21-237, it does provide Commission staff, Commissioners, and other interested parties a point of reference for Xcel’s actual 2021 reliability results compared to historical goals.

The Commission’s current approach identifies the various IEEE calculated reliability benchmarks as the goals for Minnesota’s three investor-owned utilities. Table 9 compares Xcel’s 2021 reliability results with the IEEE 2020 benchmarking results.

Table 8: Xcel’s 2021 Reliability Performance Compared with 2020 Goals Using Historical Method

Work Center	Metric	2021 Performance	2020 Goals
Minnesota	SAIDI ¹⁴	88.83	NA
NA	SAIFI ¹⁵	0.92	NA
	CAIDI ¹⁶	96.33	NA
Metro East	SAIDI	82.00	89.95
	SAIFI	0.83	0.84
	CAIDI	98.41	106.91
Metro West	SAIDI	94.56	79.37
	SAIFI	1.05	0.79
	CAIDI	89.67	100.55
Northwest	SAIDI	93.42	87.11
	SAIFI	0.74	0.75
	CAIDI	126.13	115.72
Southeast	SAIDI	79.80	94.82
	SAIFI	0.76	0.76
	CAIDI	105.14	122.04

¹⁴ SAIDI stands for System Average Interruption Duration Index.

¹⁵ SAIFI stands for System Average Interruption Frequency Index.

¹⁶ CAIDI stands for Customer Average Interruption Duration Index.

Table 9: 2021 Reliability Performance Compared to 2020 IEEE Results

Work Center	Metric	2021 Performance	2020 IEEE Goals
Minnesota	SAIDI	88.83	103
	SAIFI	0.92	1.06
	CAIDI	96.33	108

This ex-post 2020 comparison places Xcel's reliability efforts in a slightly better light when compared to the historical method. The Company would have met all three reliability goals identified.

While the IEEE 2020 results provide a useful proxy for the yet-to-be-calculated 2021 IEEE reliability results, the Department will provide additional comments after Xcel provides the 2021 IEEE benchmarking information later this year.

Based on its review of Xcel's 2021 system-wide reliability requirements reporting, the Department concludes the Company appears to have fulfilled the requirements of Minnesota Rules 7826.0500, subps. 1.A, 1.B, and 1.C.

2. *Storm-Normalization Method*

Xcel reported both normalized and non-normalized SAIDI, SAIFI, and CAIDI metrics in its filing, beginning on page 24.

As noted above, the Company stated it used the IEEE 1366 storm day threshold calculation procedures for its 2021 data. Using the previous five years of outage history for each region, Xcel identified the storm day threshold by:

- Calculating the daily SAIDI.
- Calculating the natural log of each daily SAIDI.
- Calculating the average and standard deviation of the natural logs.

A Major Event Day (MED) is one in which the outages met or exceeded the storm day threshold. Xcel reported its reliability data is normalized to account for major storms by removing outages that start on a MED.

The Department acknowledges Xcel fulfilled the requirements of Minnesota Rules 7826.0500, subp. 1.D.

3. *Action Plan to Improve Reliability*

Xcel provided a lengthy and detailed reliability analysis for each of the four work centers, including the following:

- Actual annual reliability factors by work center for the past five years.
- The top causes of customer interruptions in 2020.
- The incremental change in those different customer interruption drivers.
- An analysis of the different events and days that caused customer interruptions as well as the type of equipment that failed.

Attachment I of Xcel's filing reported on staffing and reliability for Xcel's Southeast Work Center. Attachment J of the filing included a description of Xcel's reliability management program development.

The information in Attachment I discussed the Company's efforts to improve system reliability in the Southeast Work Center, whereas Attachment J provided a broader perspective on Xcel's efforts to proactively manage its distribution network reliability.

The Department acknowledges Xcel fulfilled the requirements of Minnesota Rules 7826.0500, subp. 1.E.

4. *Bulk Power Supply Interruptions*

Xcel reported no generation outages on the Company's system that caused an interruption of service to firm electric customers in 2021. Xcel provided a table listing interruptions caused by transmission outages.¹⁷ The table identifies the transmission line, date, time, duration, reasons for the interruption, comments, and remedial steps taken or planned.

The Department acknowledges Xcel fulfilled the requirements of Minnesota Rules 7826.0500, subp. 1.F.

5. *Major Service Interruptions*

Minnesota Rules 7826.0500, subp. 1.G. requires an electric utility to provide a "copy of each report filed under part 7826.0700." Minnesota Rules 7826.0700 requires an electric utility to "promptly inform the commission's Consumer Affairs Office (CAO) of any major service interruption occurring on the utility's system with certain information."

¹⁷ See Attachment N of the filing.

The Commission’s Order dated December 18, 2020, in Docket No. E002/M-20-406 varied the requirement in Minnesota Rules 7826.0500, subp. 1.G and ordered Xcel to file a summary table in an attachment.¹⁸

In 2021, Xcel reported 231 outages on its system met the definition of “major service interruption.” The Company only had 264 of these types of outages in 2021. Table 10 below shows the number of outages the Company did not report to the CAO and the total number of major service interruptions Xcel reported.

Table 10: Major Service Interruptions Not Reported to the Minnesota Public Utilities Commission’s Consumer Affairs Office 2012 -2021

Year	Unreported Major Service Interruptions	Number of Major Service Interruptions	Percent Unreported
2012	5	252	2%
2013	2	605	<1%
2014	11	233	5%
2015	27	259	10%
2016	12	310	4%
2017	6	154	4%
2018	6	243	2%
2019	5	214	2%
2020	9	264	3%
2021	13	231	6%
10-yr Avg.	10	277	3%
Variance	30%	-17%	

The Company noted each of the 13 unreported major service interruptions were due to human error. The 2021 results suggest the 13 unreported outages were above the ten-year average while the number of major outages was a bit below the ten-year average.

Xcel reported no major service interruptions in which ten percent or more of its Minnesota customers were without service for 24 hours or more in 2021.

The Department acknowledges Xcel fulfilled the requirements of Minnesota Rules 7826.0700.

¹⁸ See Attachment G of the filing.

6. *Worst Performing Circuit*

Attachment M to the filing provides information regarding this requirement by work center. The Company also included information in Attachment M related to operational steps Xcel is taking regarding the feeder's future reliability.

The Department acknowledges Xcel fulfilled the requirements of Minnesota Rules 7826.0500, subp. 1.H.

7. *Compliance with ANSI Voltage Standards*

Xcel reported it conducted 212 voltage investigations in 2020. After investigation, the Company found approximately 17% of these instances were caused by a specific voltage problem. In cases where the Company finds that the voltage is not within the acceptable range, actions are taken such as swapping transformers, upgrading transformers, or checking capacitor banks.

The Department acknowledges Xcel fulfilled the requirements of Minnesota Rules 7826.0500, subp. 1.I.

8. *Work Center Staffing Levels*

Xcel reported its 2020 staffing levels by work center. Table 11 below contains this information for the past ten years. The Company's historical staffing level increased by four employees from 2020 and is 2% above the ten-year average.

Table 11: Xcel's Historical Work Center Staffing Levels 2012 - 2021

Year	Metro East	Metro West	Northwest	Southeast	Other	Total
2012	131	169	32	51	37	420
2013	128	173	32	53	41	427
2014	126	176	33	53	46	434
2015	128	179	33	51	45	436
2016	124	184	30	47	46	431
2017	119	176	31	46	46	418
2018	124	180	32	49	47	432
2019	123	177	30	49	45	424
2020	125	181	31	49	49	435
2021	132	171	33	51	52	439
10-yr Avg	126	177	32	50	45	430
Var.	5%	-3%	4%	2%	15%	2%

The Department acknowledges Xcel fulfilled the requirements of Minnesota Rules 7826.0500, subp. 1.J.

9. *Proposed 2021 Standards for SAIFI, SAIDI and CAIDI*

In its filing, Xcel noted the Commission's March 2, 2022 Order in Docket No. E002/M-21-237 required the Company to use the following 2021 IEEE benchmarking results as Xcel's 2021 proposed standards:

- Metro East work center - second quartile using the large utilities peer group;
- Metro West work center - second quartile using the large utilities peer group;
- Northwest work center - second quartile using the medium utilities peer group.
- Southeast work center - second quartile using the medium utilities peer group.

The IEEE Distribution Reliability Working Group benchmarking information will not be available until later this year. Xcel will provide supplemental information once it receives and has an opportunity to review that information.

The Department concludes Xcel complied with the requirements for setting the annual reliability standards listed in Minnesota Rules 7826.0600, subp. 1.

E. *RELIABILITY AND SERVICE QUALITY REPORTING REQUIREMENTS REQUIRED BY COMMISSION ORDER*

The Company identified 14 different proceedings and 14 Commission Orders containing compliance or reporting requirements related to service reliability. Given the emphasis the Commission has placed on gathering additional reliability information in the past few years, the Department elected to review Xcel's compliance efforts with those Orders in reverse chronological order.

- 2020 Annual Safety, Reliability and Service Quality Standards Report (E002/M-21-237) – ORDER, dated December 2, 2021, and ORDER ACCEPTING REPORTS AND SETTING 2021 RELIABILITY STANDARDS, dated March 2, 2022.
- 2019 Annual Safety, Reliability and Service Quality Standards Report (E002/M-20-406) – ORDER ACCEPTING REPORTS, REQUIRING ADDITIONAL FILINGS, AND DESTABLISHING WORKSHOP, dated December 18, 2020.
- 2018 Annual Safety, Reliability and Service Quality Standards Report (E002/M-19-261) – ORDER ACCEPTING REPORTS, ESTABLISHING RELIABILITY STANDARDS AND REQUIRING ADDITIONAL FILINGS dated January 28, 2020.
- 2017 Annual Safety, Reliability and Service Quality Standards Report (E002/M-18-239) – ORDER ACCEPTING REPORTS, SETTING 2018 RELIABILITY STANDARDS AND SETTING FUTURE REPORTING REQUIREMENTS dated March 19, 2019.
- 2016 Annual Safety, Reliability and Service Quality Standards Report (E002/M-17-249) – ORDER dated February 9, 2018.
- 2015 Annual Safety, Reliability and Service Quality Standards Report (E002/M-16-281) – ORDER dated February 9, 2018.

- 2013 Annual Safety, Reliability and Service Quality Standards Report (E002/M-14-131) – ORDER dated December 12, 2014.
- 2012 Xcel Energy Electric General Rate Case (E002/GR-12-961) – ORDER APPROVING XCEL'S COMPLIANCE FILING AND REQUIRING ADDITIONAL COMPLIANCE REQUIREMENTS dated November 19, 2013.
- 2009 Annual Safety, Reliability and Service Quality Standards Report (E002/M-10-310) – ORDER dated September 30, 2010.
- 2008 Annual Safety, Reliability and Service Quality Standards Report (E002/M-09-343) – ORDER dated August 11, 2009.
 - Commission Investigation into Xcel Energy Inaccurate Gas Meters, Recalculation of Bills and Related Issues, Docket Nos. E,G002/M-09-224 and G002/CI-08-871, ORDER dated November 30, 2010.
 - 2004 Annual Safety, Reliability and Service Quality Standards Report (E002/M-05-551) – ORDER ACCEPTING ANNUAL REPORTS, SETTING RELIABILITY STANDARDS AND SETTING FILING REQUIREMENTS, dated April 7, 2006.
 - 2003 Annual Safety, Reliability and Service Quality Standards Report (E002/M-04-511) – ORDER ACCEPTING ANNUAL SAFETY, RELIABILITY AND SERVICE QUALITY REPORTS, APPROVING 2004 RELIABILITY STANDARDS, GRANTING VARIANCES AND CLARIFYING REQUIREMENTS, dated November 3, 2004.

The Department elected to review the 14 different Orders in one section of its comments. This simplified the review process as the Department was not required to parse the different Commission reporting requirements into safety, reliability, or service quality categories.

1. 2021 Annual SRSQ Filing – March 2, 2022, Order

The Commission's March 2022 Order in Docket No. E002/M-21-237 requires Xcel Energy to include the following in its Annual Report at Order Points 8, 9, and 10.

8. The Commission sets Xcel Energy's 2021 statewide reliability standard at the IEEE benchmarking second quartile for large utilities, sets Xcel's Southeast and Northwest work center reliability standards at the IEEE benchmarking second quartile for medium utilities; and sets Xcel's Metro East and Metro West work center reliability standards at the IEEE benchmarking second quartile for large utilities.
9. Xcel Energy must file a supplemental filing to its 2021 safety, service quality, and reliability report 30 days after the IEEE publishes the 2021 benchmarking results. The supplemental filing must include an explanation for any standards the utility did not meet.
10. Xcel must facilitate record development in its current rate case that examines the Company's distribution system spending and maintenance in the Southeast Work Center compared to other areas of the Company's service territory.

The Department verifies Xcel complied with Order Point 8 in its 2021 Annual Report. The requirement in Order Point 9 is prospective and the Company committed to provide that information as well. The requirement in Order Point 10 relates to a different proceeding, the Company's 2021 Electric general rate case. The Department requests the Company provide this information in its reply comments.

The Department concludes Xcel Energy appears to have fulfilled the requirements of the Commission's March 2, 2022, Order in Order Points 8 and 9 in Docket No. E002/M-21-237 to the extent possible. The Department will provide additional information on Order Point 10 once it reviews the information the Company provides in its reply comments.

2. *2021 Annual SRSQ Filing – December 2, 2021, Order*

The Commission's December 2021 Order Points 2 through and 7 in Docket No. E002/M-21-237 require utilities to include the following in its service quality report:

- 1) Electronic utility-customer interaction beginning with the reports filed in April 2023;
 - 2) Percentage uptime and error rate percentage information for the General Website, Payment Service and Outage map/&/or Outage Info page as well as the error rate percentage for payment services beginning in April 2023.
 - 3) To continue to provide 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 disconnections as part of reporting under Minn. R. 7826.1700.
 - e) Xcel to provide additional information on the progress it made hiring new call center representatives in 2021 and the effects of those new employees on its agent only metrics.
 - f) A requirement to add in the upcoming and subsequent reports a "DER Complaint" reporting category.
 - g) Public facing summaries with their annual Safety, Reliability, and Service Quality reports.
- a) *Specific Percentage Uptime and Error Rater Percentage Information*

Xcel is collecting this information and will provide it in its 2023 SRSQ Annual Report which will be filed in April 2024.

b) *Percentage Uptime and Error Rate Percentage Base Data Collection*

The Company is committed to providing the Commission this information over the next two annual SRSQ reporting cycles.

c) *Electronic Customer Contact Information*

The Company provided the information requested in the 2020 and 2021 reports thereby meeting the requirement in the 21-237 Order.

Xcel included a discussion addressing Order Point 14 of the Commission's December 2020 Order on pages 64-65 of its Report.

The Company provided monthly page views of its website, Facebook, MyAccount, as well as the number of mobile app installations. The Department summarizes these annual figures in Table 12 below for 2020 and 2021:

Table 12 Comparison of Xcel's 2020 and 2021 Page Views and App Installations Totals

Description	2020 Results	2021 Results	Percentage Difference
Website	12,681,427	11,098,531	-12.4%
MyAccount, Mobile App Installations	19,432,738	14,626,276	-24.7%
Email	235,210	121,679	-48.2%

Xcel also provided a monthly summary of all emails received through the customerservice@xcelenergy.com email address, as well as a chart of the subject category of each email. The Department summarizes these annual figures for 2020 and 2021 in the table below:

Table 13 Comparison of Xcel's 2020 and 2021 Annual Number of Emails Received and Number of Emails Received by Top Six Subject Categories

Email Topic	2020	2021	Percentage Difference
Billing	70,093	42,344	-39.6%
Start/Stop/Transfer	52,922	36,625	-30.8%
MyAccount	41,161	20,929	-49.1%
Other	12,701	6,206	-51.1
Outages	10,349	5,719	-44.7%
Credit	9,173	3,407	-62.8%
Subtotal	196,399	115,230	
Not Identified	38,811	6,449	
Total	235,210	121,679	

The information in Tables 12 and 13 is perplexing. The Company data suggest a decrease in the number of website visits and MyAccount and Mobile App Installation interactions. Email interactions declined by almost half between 2020 and 2021. The Department requests the Company discuss the potential drivers for those decreases in its reply comments. The Department is also interested in Xcel's forecast regarding these categories of interactions for 2023.

d) *File Public Facing Summaries with the Annual SRSQ Report*

The Company provide this information in Attachment H of its Annual Report.

e) *Additional Information on Hiring of New Call Center Employees*

The Company discussed its efforts to hire new call center employees on pages 9 through 11 of the Report. Xcel increased its base pay rate by 20% to hire and retain more call center representatives. The increased starting wage did help hiring; however, the Company's 2021 call center metrics still did not meet Commission requirements. Xcel attributed this outcome to the time-consuming process for training new employees and a cold winter which increased the number of customer calls.

f) *DER Complaint Reporting Category*

The Company provide this information on pages 14 through 16 of its Annual Report.

The Department review concludes Xcel met the reporting requirements in the Commission's December 2, 2021, Order in Docket No. E002/M-21-237.

3. *2019 SRSQ Filing - December 18, 2020, Order*

The Commission's December 18, 2020, Order in Docket No. E015/M-20-406 required Xcel to include the following in its service quality reports:

- Continuing to file quarterly status reports on efforts to improve reliability in the Southeast Work Center.
- Xcel must file reliability metrics for feeders with grid modernization investment.
- Electronic customer contacts at Order Point 14.
- Revised categories for reporting complaint data at Order Point 16.
- Public facing summaries.
- Requirement to file reliability information within a .csv or /xlsx file.
- Locational/Equity Reliability Data as discussed in Attachment A in its April 1, 2021, filing and an interactive map associated with that information.

a) *Southeast Work Center Reliability Reports*

The Company continues to file this information and provided a copy of the 4th quarter 2021 report as Attachment I to the filing.

b) *Reliability Metrics for Feeders with Grid Modernization Investments*

Xcel discussed this topic on pages 36 and 37 of the Report. The Company did not provide any data related to this issue.

c) *Electronic Customer Contacts*

The Department discussed the electronic customer contacts requirement above.

d) *Revised Complaint Categories*

Regarding the revised categories for reporting complaint data, the Department did participate in the workshop exercise the Commission required. Xcel discussed the results of those workshops and the corresponding new complaint categories on pages 14 and 15 of the Report.

The Company noted it participated in a Commission-sponsored work group. This work group met repeatedly and developed a refinement of the inadequate service complaint category. Xcel will begin using this revised customer complaint category in its 2023 SRSQ Annual Report which will be filed in April 2024.

e) Public Facing Summaries

This topic was discussed earlier in these comments.

f) Requirement to File Reliability Information

The Department did not identify the process for receiving this information in the Report. The Department requests the Company address this issue in its reply comments.

g) Locational Equity/Reliability Information and Interactive Map

The Company made this information available on its website on April 1, 2022 and provided a link in the Report.

The Department concludes Xcel appears to have fulfilled the requirements of the Commission's December 18, 2020, Order in Docket No. E002/M-20-406.

4. 2018 SRSQ Report

The Commission's January 28, 2020, Order in Docket No. E002/M-19-261 required a public facing summary which has been discussed previously. In addition, it included Attachment B, which updated the annual reporting requirements for the Company. Attachment B required Xcel to report the following :

- Non-normalized SAIDI, SAIFI, and CAIDI values.
- SAIDI, SAIFI, and CAIDI values calculated using the IEEE 1366 method.
- MAIFI, normalized and non-normalized.
- CEMI – at normalized and non-normalized outage levels of 4, 5, and 6.
- The highest number of interruptions experienced by any one customer.
- CELI – at normalized and non-normalized intervals of greater than 6 hours, 12 hours, and 24 hours.
- The longest experienced interruption by any one customer (or feeder).
- A breakdown of field versus office staff required.
- Estimated restoration times.
- IEEE benchmarking.
- Performance by customer class.
- More discussion of leading causes of outages and mitigation strategies.

The Department summarizes Xcel's compliance with each reporting requirement in turn.

a) Non-normalized SAIDI, SAIFI, and CAIDI values

Xcel provided information that appears to fulfill the first two of these requirements in its Table 12 at page 26 of the Report. The Company reported “Historical Reliability & Storm Day Exclusions” calculated according to three different approaches – 1) All Days; 2) Minnesota Quality of Service Tariff methodology; and 3) Annual Rules methodology. In addition, the Company provided a graph delineating the major causes of outages in 2021 for its entire Minnesota service territory as well as by work center. This information appears responsive to the second requirement listed above.

b) SAIDI, SAIFI, and CAIDI values calculated using the IEEE 1366 method

See Table 12 of the Annual Report.

c) MAIFI – normalized and non-normalized

Xcel provided this information on pages 66 and 67 of its Annual Report. The Company provided MAIFI calculations by work center and for all of Minnesota for the 2010 through 2021 period using three different calculation protocols. These included 1) with storms, all levels all causes; 2) QSP tariff IEEE approach, no transmission outages; and 3) Annual Rules IEEE all levels.¹⁹ Xcel also provided information on the MAIFI drivers by work center.

The Department concludes Xcel complied with these reporting requirements.

d) Customers Experiencing Multiple Interruptions (CEMI)

Xcel provided this information in Graph 20 on page 73 of the filing. The information in that graph suggests the Company’s CEMI 4, 5, 6+ results for 20201 were worse (higher as a percentage) than the last several years. The Department will continue to monitor this situation.

The Department concludes Xcel complied with this reporting requirement.

e) Highest number of interruptions by any one customer (or feeder, if customer level is not available)

Xcel noted two customers experienced 11 outages, and the Company was working to resolve these customers’ reliability issues.

The Department concludes Xcel complied with this reporting requirement.

¹⁹ Report at pages 54 through 60.

f) CELI – at intervals of greater than 6 hours, 12 hours, and 24 hours

Xcel provided this information in Graphs 22 and 23 on page 75 of the filing. The Department did not identify a trend towards improvement in Graph 22. A cursory review of Graph 23 suggested a trend towards improvement.

The Department concludes Xcel complied with this reporting requirement

g) Longest interruption experienced by any one customer

Xcel discussed this metric on pages 75 and 76 of the Report. The longest outage in 2021 was 3,848 minutes (64 hours or 2 days 16 hours). It affected one customer.

h) A breakdown of field vs office staff required

The Department previously discussed this information on page 17 of these comments.

i) Estimated time of restoration

Order Point 2 (Attachment B, item 9) in the January 28, 2020, Order in Docket No. E002/M-19- 261 also requires the Company to provide the estimated restoration time accuracy from 0 to +30 minute window.

The Company discussed estimated restoration times (ERTs) and the Company’s measurement efforts, along with communication it has provided to its customers.²⁰

Table 14 below shows the Company’s performance related to its ERTs over the past three years.

Table 14: ERT Accuracy – Within -90 to +0 Minutes

Entity	2016	2017	2018	2019	2020	2021
NSPM	45.9%	43.5%	43.6%	48.3%	54.4%	53.9%
MN Only	45.7%	43.1%	43.5%	49.9%	54.3%	54.8%

The Company appears demonstrate some improvement in this metric. Table 15 provides similar information for the +1 to +30 minute ERT window.

²⁰ Report at pages 49 through 52.

Table 15: ERT Accuracy – Within +1 to +30 Minutes

Entity	2016	2017	2018	2019	2020	2021
NSPM	8.2%	10.1%	8.0%	10.0%	10.4%	11.3%
MN Only	8.3%	10.0%	7.5%	10.4%	10.3%	10.9%

The Company appears to demonstrate some improvement in this metric as well. The Department concludes Xcel complied with this aspect of the Commission Order.

j) IEEE benchmarking results for SAIDI, SAIFI, CAIDI, and MAIFI

This requirement was superseded by a similar requirement in the Commission’s Order dated March 2, 2022, in Docket No. E025/M-21-237.

k) Performance by customer class

The Company discussed this issue on page 32 of the Report and stated Xcel cannot provide specific outage data by customer class. The Company did provide a feeder-level analysis that suggests feeders with more commercial customers have better reliability metrics than those feeders that serve primarily residential customers.

The Department concludes Xcel complied with the requirement included in the Commission Order.

l) More discussion of leading causes of outages and mitigation strategies

Xcel provided this information in its discussion of factors affecting reliability reporting on pages 22 – 23 of the Annual Report. The Company discussed mitigation strategies in the grid mod section of the Annual Report on pages 26 – 34.

The Department concludes Xcel appears to have fulfilled the requirements of the Commission’s January 28, 2020, Order in Docket No. E015/M-19-261.

5. 2017 SRSQ Report

The Commission’s March 19, 2019, Order in Docket No. E002/M-18-239 required the following annual reporting requirements for the Company.

- Non-normalized SAIDI, SAIFI, and CAIDI values.
- SAIDI, SAIFI, and CAIDI values calculated using the IEEE 2.5 beta method.

- CEMI – at normalized and non-normalized outage levels of 4, 5, and 6.
- CELI – at normalized and non-normalized intervals of greater than 6 hours, 12 hours, and 24 hours.
- Estimated restoration times.
- IEEE benchmarking.
- Performance by customer class.
- More discussion of leading causes of outages and mitigation strategies.
- A discussion of how grid modernization initiatives could impact reliability metrics and what technologies are needed to advance tracking of additional metrics.

The reporting requirements listed in the first eight bullet points are the same as those addressed in response to the reporting requirements included in the Commission's January 28, 2020, Order in Docket No. E002/M-19-261. The Department will not repeat that information here.

As for the grid modernization reporting requirement, the Company addressed the issue on pages 26-34 of the Report.

6. 2016 and 2015 SRSQ Reports

The Commission's February 9, 2018, Order in Docket Nos. E002/M-16-281 and E002/M-17-249 required Xcel to provide the following information in its next annual service quality report:

- The Company's data on benchmarking with national IEEE Reliability Standards.
- A qualitative discussion of ways the Commission looks at increased granularity.
- An assessment of MAIFI data.
- A summary of the Company's response time to customers and steps the Company is taking to measure and communicate more accurately the Company's estimated response time to customers.
- The Company's internal customer satisfaction goals and a comparison of the Company's actual performance to those goals as well as an explanation of the basis for those customer satisfaction goals.
- With respect to the distribution feeder table identification provided in the report, Xcel shall include the appropriate locational labels, applicable substation name, and region to which the information relates.
- The Company's additional thinking on CEMI and CELI metrics after consultation with the DOC and other interested parties.
- Data on the number of applicants and participants in the Company's emergency medical accounts.

a) IEEE Reliability Standards and Company's Data

Xcel discussed this topic on pages 24 and 25 of the Report. Xcel committed to supplementing the Report to include IEEE 2021 benchmarking results.

b) Discussion of Increased Granularity

Several of the Commission's Orders issued regarding safety, service quality, and service reliability reporting since this docket have pushed this concept. The Department considers large parts of the Report responsive to this requirement.

c) An Assessment of MAIFI Data

See page 24 of these comments.

d) Company's Estimated Response Times

See page 24 and 25 of the comments.

e) Customer Satisfaction Goals

Xcel provided the internal goals information. The Company achieved two out of four (50%) of the annual customer satisfaction goals identified in 2021. Xcel also provided trade secret information from J.D. Power, which is summarized in **TRADE SECRET** Tables 16 and 17.

PUBLIC Table 16 Comparison of Xcel’s 2020 and 2021 JD Power Residential Satisfaction Metrics for NSP

Metric	2020 Index Score	2021 Index Score	2020 Peer Percentile Rank	2021 Peer Percentile Rank
Overall Customer Satisfaction Index	[TRADE SECRET DATA HAS BEEN EXCISED]			
Power Quality and Reliability				
Price				
Billing and Payment				
Corporate Citizenship				
Communications				
Customer Contact				

It is unwise to draw any broad conclusions from this comparison of Xcel’s 2020 and 2021 JD Power residential customer satisfaction results given the information provided. However, it does not appear Xcel’s residential customers’ satisfaction levels are increasing in any of the seven metrics listed. Perhaps the most concerning figure is the Billing and Payment metric’s 2021 percentile rank. The Department requests the Company discuss these results in greater detail in its reply comments.

PUBLIC Table 17 Comparison of Xcel’s 2020 and 2021 JD Power Small Commercial Satisfaction Metrics for NSP

Metric	2020 Index Score	2021 Index Score	2020 Peer Percentile Rank	2021 Peer Percentile Rank
Overall Customer Satisfaction Index	[TRADE SECRET DATA HAS BEEN EXCISED]			
Power Quality and Reliability				
Price				
Billing and Payment				
Corporate Citizenship				
Communications				
Customer Contact				

A comparison of the 2020 and 2021 customer satisfaction results for the Small Commercial class is a bit more favorable. Three of the six metrics increased slightly. The Department requests the Company discuss these results in greater detail in its reply comments as well.

f) Distribution Feeder Location Requirement

This requirement was superseded by the Commission’s reporting requirement included in the Commission’s December 18, 2020, Order in Docket No. E002/M-20-406 regarding Attachment A.

g) The Company’s Thinking on CEMI and CELI After Consultation with Other Parties

This requirement was superseded by the Commission’s reporting requirement included in the Commission’s January 28, 2020, Order in Docket No. E002/M-19-261 regarding Attachment B.

h) Data on the Company’s Emergency Medical Accounts

See page 10 of these comments.

7. *2013 SRSQ Report*

The Commission's December 12, 2014 Order in Docket No. E002/M-14-131 required Xcel to provide the following information in its next annual service quality report:

- 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 as a whole, increased reliability, and active contingency planning.
- Incorporate 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.
- Report on the major causes of outages for major event days.
- Require Xcel to consider other factors, in addition to historical data, on which to base its reliability indices for 2014 in an effort to demonstrate its commitment toward improving reliability performance.
- Require Xcel to continue reporting major service interruptions to the Commission's Consumer Affairs Office.

a) Augment Description of Policies and Procedures to Assure Reliability

The Company discussed this Order Point on pages 23 and 24 of the filing. Compared to the 2013 filing, Xcel is providing significant amounts of information in response to additional Commission ordered reporting requirements.

b) Incorporate a Summary Table to More Easily Assess the System's Overall Reliability

See Table 12 on page 28 of the Report.

c) Report on the Major Causes of Outages for Major Event Days

See Graphs 1 through 4 on pages 29 through 31 of the Report.

d) Require Xcel to Consider Other Factors on Which to Base its Reliability Indices Other than Historical Data

The Commission's decision to use the IEEE Benchmarking Results as reliability goals in its March 2, 2022, Order in Docket No. E002/M-21-237 is the culmination of Xcel's and the Commission's work to move from a historical perspective to a peer-group perspective.

- e) Require Xcel to Continue Reporting Major Service Interruptions to the CAO

The topic is discussed on page 18 of these comments.

8. *2012 Electric General Rate Case*

The Commission's November 19, 2013, Order in Docket No. E002/GR-12-961 required Xcel to provide the following information in its April 1, 2014, Annual Report:

- A table with annual MAIFI results for Minnesota and the four work centers using three different normalization methodologies.
- A table with the MAIFI results and Customer Interruptions by month and work center.
- A five-year historical look for Minnesota MAIFI that shows the three different normalization methodologies and their associated trend lines.
- A pareto charge showing the top causes for interruptions for the current year.
- A pareto charge showing the top causes for interruptions for the past five years.

The Company provided information responsive to these five topics on pages 66 through 71 of the Report as well as in Attachment P.

9. *2009 SRSQ Report*

The Commission's September 30, 2010, Order in Docket No. E002/M-10-310 required Xcel to provide the following information in its next annual service quality report:

- Augment their next filing to include a description of the policies, procedures, and actions that it has implemented, and plans to implement, to assure reliability. Xcel should include information on how it is demonstrating proactive management of the system as a whole, increased reliability, and active contingency planning.
- Continues to require Xcel to incorporate a summary table (or summary information in some other format) that allows the reader to more easily assess the overall reliability of the system and identify the main factors that affect reliability.
- Requires Xcel to report on the major causes of outages for major event days.

- a) Augment Description of Policies and Procedures to Assure Reliability

The Company discussed this Order Point on pages 23 and 24 of the filing.

- b) Incorporate a Summary Table to More Easily Assess the System's Overall Reliability

See Table 12 on page 28 of the Report.

c) Report on the Major Causes of Outages for Major Event Days

See Graphs 1 through 4 on pages 29 through 31 of the Report.

10. *2008 SRSQ Report*

The Commission's September 30, 2010, Order in Docket No. E002/M-10-310 required Xcel to provide the following information in its next annual service quality report:

- 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. Xcel shall include information on how it is demonstrating proactive management of the system as a whole, increased reliability, and active contingency planning, including a specific discussion of the status and actions of its strategic initiatives as set forth in Ordering Paragraph 4a of its Order Accepting Annual Reports, Setting Reliability Standards and Setting Additional Filing Requirements in Docket No. E002/M-08-393 (October 24, 2008).
- Incorporate into its next filing a summary table (or summary information in some other format) that allows the reader to more easily assess the overall reliability of the system and identify the main factors that affect reliability.

a) Augment Description of Policies and Procedures to Assure Reliability

The Company discussed this Order Point on pages 23 and 24 of the filing.

b) Incorporate a Summary Table to More Easily Assess the System's Overall Reliability

See Table 12 on page 28 of the Report.

11. *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, 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.

The Company provided this information in Attachment D to the filing. It appears the total amount of orders increased from 8269 in 2020 to 8757 in 2021 or 6%. The average days for those orders decreased from 3.88 in 2020 to 4.17 in 2021, while the total number of maximum days and the standard deviation increased from 88 to 170 and 3.69 to 5.09 respectively. The Department would characterize Xcel's 2021 results as mixed compared to its 2020 results. In the Report, the Company noted ongoing issues arising from the COVID-19 pandemic influenced its 2021 results.

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

12. 2004 SRSQ

The Commission's April 7, 2006 Order in Docket No. E002/M-05-551 required Xcel to provide the following information in its 2006 annual service quality report:

- Xcel shall report on the 25 worst performing circuits in each of its four work centers.

The Company discusses this requirement on pages 55 through 57 of the Report. Attachment M also addresses this requirement.

13. 2003 SRSQ

In the Commission's November 3, 2004 Order in Docket No. E002/M-04-511, the Commission required Xcel to include the following information in future reports:

- A copy of every notification of an outage event sent to the Consumer Affairs Office which meets the standards set forth in Minnesota Rules 7826.0700, subp. 1 affecting 500 or more customers for one or more hours.
- Data regarding credit calls...in its calculation of call center response times.

a) Filing Outage Reports with CAO

The Commission varied that rule requirement in its Order dated December 18, 2020, in Docket No. E002/M-20-406, so this requirement is no longer applicable.

b) Including Credit Calls in Calculation of Call Center Response Times

The Company has included this requirement in this calculation for several years. See Attachment F of this year's Report.

14. Department Review of Xcel's Compliance Efforts Relative to Commission Orders Regarding Service Quality and Service Reliability

The Department's review of these different Orders finds the Company largely complied or attempted to comply with the Commission's reporting requirements. Except for the Department's request for additional information, the Department believes Xcel provided the Commission-requested information. The Department also suggests the Commission consider initiating a work group to review and simplify the different reporting requirements included in the 14 or so Commission Orders that cover this topic. There are several overlapping Commission requirements regarding different aspects of the SRSQ as the somewhat cumbersome approach we used in this section of the Department's comments identifies. It would be helpful to condense and simplify those Order requirements for future Annual Reports.

III. CONCLUSION AND RECOMMENDATIONS

The Department recommends the Commission accept the Company's 2021 Safety Report.

The Department also requests the Company provide information on the following topics in its Reply Comments:

- A comparison of JD Power survey results for 2020 and 2021.
- Explain the 2021 commercial class results for service installation times as compared to 2020.
- Additional information regarding the requirement in Order Point 10 of the Commission's March 2, 2022 Order in Docket No. E002/M-21-237 regarding information provided in the Company's 2021 Electric general rate case.
- A discussion of the drivers for the apparent decrease in the number of website visits and MyAccount and Mobile App Installation interactions as well as Email interactions between 2020 and 2021.
- The process for receiving reliability information in an electronic format as identified in the Commission's December 2, 2021, Order in Docket No. E002/M-21-237.

The Department also suggests the Commission consider initiating a work group to review and simplify the different reporting requirements included in the 14 or so Commission Orders that cover the information included in Xcel's Service Reliability and Service Quality Report.

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
Corrected Public Comments**

Docket No. E002/M-22-162

Dated this 7th day of **June 2022**

/s/Sharon Ferguson

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