



414 Nicollet Mall
Minneapolis, Minnesota 55401

June 24, 2022

**PUBLIC DOCUMENT
NOT PUBLIC DATA EXCISED
—Via Electronic Filing—**

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

RE: REPLY COMMENTS
2021 ANNUAL SERVICE QUALITY REPORT
DOCKET NO. E002/M-22-162

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission these Reply Comments in response to the June 2, 2022 Department of Commerce Comments submitted in the above-referenced docket regarding our Annual Report on safety, reliability, and service quality and our proposed reliability standards for 2022.

We have electronically filed this document with the Commission, and copies have been served on the parties on the attached service list. Please contact me at 612-337-2096 or bridget.dockter@xcelenergy.com, or Pamela Gibbs at pamela.k.gibbs@xcelenergy.com or 612-330-2889 if you have any questions regarding this filing.

Sincerely,

/s/

BRIDGET N. DOCKTER
REGULATORY MANAGER

Enclosures
c: Service List

PUBLIC DOCUMENT – NOT PUBLIC DATA EXCISED

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Joe Sullivan	Vice Chair
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
John Tuma	Commissioner

IN THE MATTER OF NORTHERN STATES
POWER COMPANY'S ANNUAL REPORT ON
SAFETY, RELIABILITY, AND SERVICE
QUALITY FOR 2021; AND PETITION FOR
APPROVAL OF ELECTRIC RELIABILITY
STANDARDS FOR 2022

DOCKET NO. E002/M-22-162

REPLY COMMENTS

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission these Reply Comments in response to the June 2, 2022 Comments in the above-referenced docket regarding our 2021 Annual Report on Safety, Reliability, and Service Quality (2021 Annual Report) and our proposed reliability standards for 2022.

We appreciate the Department of Commerce's (Department) thorough review and recommendation that the Commission accept our 2021 Annual Report. In Comments, the Department also recommended the Company provide:

- A comparison of the JD Power survey results for 2020 and 2021;
- An explanation of the 2021 commercial class results for service installation times as compared to 2020;
- Additional information regarding the requirement in Order Point 10 of Commission's March 2, 2022 Order in Docket No. E002/21-237 in the Company's 2021 Electric general rate case;
- A discussion of the drivers for the apparent decrease in the number of website visits, MyAccount/mobile application installations, and email interactions between 2020 and 2021; and

- The process for receiving reliability information in an electronic format as identified in Commission’s December 2, 2021 Order in Docket No. E002/M-21-237

REPLY COMMENTS

A. Response to Department Recommendations

In their Comments, the Department recommends approval of our 2021 Annual Report. The Department also requests the Company provide additional information in these Reply Comments on various topics. We address each of these requests below.

1. Comparison of JD Power Survey Results for 2020 and 2021

While reviewing and preparing this Reply, we discovered an error in the Customer Contact index score that we provided in the 2021 Annual Report. A corrected Table 9 from the Company’s Annual Report has been inserted below and the corrected number for the Residential Customer Contact metric has been inserted in red font.

**TABLE 9: 2021 J.D. POWER RESIDENTIAL
ELECTRIC SATISFACTION FOR NSP**

2021 Residential	Index Score	Peer Percentile Rank
		[PROTECTED DATA BEGINS...
Overall Customer Satisfaction Index	755	
	[PROTECTED DATA BEGINS	
Power Quality & Reliability		
Price		
Billing & Payment		
Corporate Citizenship		
Communications		
Customer Contact		

...PROTECTED DATA ENDS]

The Department requested the Company provide additional discussion regarding why our customer satisfaction levels are not increasing in any of the seven metrics. The J.D. Power Residential Electric Customer Satisfaction study is a national benchmark study where indexes are calculated on a 1,000-point scale. Table 1 illustrates the

comparison of 2020 versus 2021. While the scores vary slightly from year to year, a statistically significant increase or decrease requires a year over year variation of more than 20 points. The indexes are based on the approximate 1,100 respondents obtained during 2021. Significant gains in customer satisfaction requires changing overall customer perceptions for the 41 attributes J.D. Power uses in their scoring. Those attributes include: customer communications during an outage; ease of understanding and fairness of pricing; ease and variety of options to pay bills; taking action to care for the environment; helping customers understand how to reduce energy use; communicating safety around electricity; and ease of using our call center and website for customer service. J.D. Power data scientists use proprietary regression modeling to refine this weighting annually to maintain a current picture of what drives customer satisfaction with utilities.

All topics are part of the model J.D. Power utilizes to create the indexes. Often times, customers are not aware of the Company's efforts in the topic categories, and, as a result, may underrate the Company. The Company remains committed to continually improving customer service and addressing the concerns raised in the J.D. Power study results.

Table:1

Residential	2020 Index Score	2021 Index Score
Overall Customer Satisfaction Index	763	755
	[PROTECTED DATA BEGINS]	[PROTECTED DATA BEGINS]
Power Quality & Reliability		
Price		
Billing & Payment		
Corporate Citizenship		
Communications		
Customer Service		
	PROTECTED DATA ENDS]	PROTECTED DATA ENDS]

Small/Medium Business	2020 Index Score	2021 Index Score
Overall Customer Satisfaction Index	804	797
	[PROTECTED DATA BEGINS]	[PROTECTED DATA BEGINS]
Power Quality & Reliability		
Price		
Billing & Payment		
Corporate Citizenship		
Communications		
Customer Service		
	PROTECTED DATA ENDS]	PROTECTED DATA ENDS]

The Department requested the Company provide additional discussion regarding the Company's results in the Small Commercial Satisfaction results. Similar to the Residential study, the J.D. Power Business Electric Customer Satisfaction study is also a national benchmark study where indexes are calculated on a 1,000-point scale. The study is smaller in scope and has a smaller participation rate compared to the residential study due to the relative number of business customers available to survey. The Company's 2021 results are based on 285 respondents, and a statistically significant change requires an upward/downward change of more than 40 index points. Results indicate that the Company remains in line with the industry averages because none of the factor index scores meaningfully differ from the industry average (i.e., there are no statistically significant changes that would clearly indicate a positive improvement or negative decline).

2. Explain the 2021 commercial class results for service installation times as compared to 2020

Several factors impacted the increased turn-around time for commercial service extensions in 2021 as outlined below:

- **Permitting** – Some cities require additional information when applying for permits, which is not always easily available. Cities are requiring all utilities (such as cable, water, sewer) to be mapped on the permit application. This requires additional information to be collected even before Xcel Energy can apply for the service extension permit. This typically impacts only commercial

requests as residential service extension requests are overall much smaller and simpler in scope than commercial service extensions.

- **Customer Delays** – It is not uncommon to have a delayed extension due to the customer not being ready. There are multiple reasons why the customer is not ready such as, but not limited to: site readiness, meter inspections completed, or incorrect labeling on the meter sockets. When the customer is not ready, this can require the Company to make multiple trips to the site. If work needs to be rescheduled, it affects multiple departments in order to coordinate new timing and requesting new locates. Rescheduling also creates delays for other customers and is not always possible within the customer's new time frame.
- **Supply Chain Issues** – During 2021, both the Company and some of our commercial customers encountered longer delays due to required material and equipment lead-times lengthened by suppliers. For example, during 2021, the Company experienced a significant increase in lead-times for certain types of transformers, increasing to over one year from the point of order to the point of delivery. This type of supply chain issue typically impacts only commercial requests as residential service extension requests require a simpler equipment installation, being service wire and associated connectors.
- **Design Resource Issues** – During 2021, we experienced unusually high turn-over in our Distribution designer resources, causing longer lead-times to get some of our commercial service extension designs completed. Again, this would have a much greater impact on commercial service extensions as residential service requests are simpler and typically do not require much design support.

3. Additional information regarding the requirement in Order Point 10 of Commission's March 2, 2022 Order in Docket No. E002/21-237 regarding information provided in the Company's 2021 Electric general rate case.

The Company is currently in the process of gathering the required capital expenditures and operations & maintenance (O&M) expense information to fulfill this Order point. Once the information has been gathered, it will be analyzed and provided as part of the Rebuttal Testimony on November 8, 2022 in the Company's MN Electric Rate Case, Docket No. E002/M-21-630.

4. A discussion of the drivers for the apparent decrease in the number of website visits, MyAccount/mobile application installations, and email interactions between 2020 and 2021

In our 2021 Annual Report, we noted a “one-time” system glitch where we lost some website tracking capabilities. This glitch has since been corrected and additional processes and internal reporting has been established to identify sudden changes in any channel.

In 2021, the number of overall customer contacts with Xcel Energy decreased as a result of the pandemic related moratorium on credit activities within the state. Additionally, the Company has been assessing overall customer experience and observed that customer satisfaction tends to be higher with phone call transactions, as compared to email transactions. The Company’s Voice of the Customer Transaction Survey (VOC) is the most direct measure of customer satisfaction with the services provided by the Customer Care organization. Since the start of the pandemic, monthly customer satisfaction for email transactions measured by our VOC has been an average of 7.1 percent below our phone transactions (agent and IVR handled). As such, the reductions in email transactions are not surprising to us.

Additionally, we have created a process to consistently automate more and more of our incoming tenant changes. This was at first a partially manual process but has been improved to realize over a 55 percent success rate, with the intent for full automation in the coming years. The 55 percent that are currently fully automated are completed the same day the customer submits a request and as a result, have decreased the actual email or calls to our customer care call center. This is important to note because with the more manual process, we have seen that many customers will call or email if they do not see anything by day three. This new automated process has made strides to clear that channel for our customers.

We note we are in the second year of reporting Website (XE.com) visits and My Account and Mobile App users pursuant to the Commission’s December 2020 Order in the Annual Service Quality reports. While reviewing and preparing this Reply, we discovered a discrepancy in the manner the data has been collected the past two years. A thorough review of the last two year’s data has been reviewed and revised numbers can be found below. As noted in this chart, our numbers have actually increased from 2020 to 2021. We are currently working to implement consistent processes for better accuracy of data collection.

As Submitted	2020 Results	2021 Results
Website Visits	12,681,427	11,098,531
My Account + Mobile App	19,432,738	14,626,276

Revised	2020 Results	2021 Results
Website Visits	12,673,590	14,351,582
My Account + Mobile App	15,910,472	17,818,268

5. The process for receiving reliability information in an electronic format as identified in Commission’s December 2, 2021 Order in Docket No. E002/M-21-237

Attachment L to the 2021 Annual Report provides customer class information along with the reliability data by feeder. Attachment L contains information that the Company believes could be manipulated to reveal the location and size of facilities serving our customers. The public disclosure or use of this information creates a risk because those who want to disrupt the electrical grid for political or other reasons may learn which facilities to target to create the greatest disruption. For this reason, pursuant to Minn. Stat. § 13.37, subd. 2, we have excised this data from the public version of our filing. Organizations wishing to obtain a copy of non-public data, are required to complete a Non-Disclosure Agreement with the Company. Parties may reach out to the regulatory contact noted in the filing for assistance.

Finally, the Department suggested the Commission consider initiating a work group to review and simplify the different reporting requirements included in the 14 plus Commission Orders that cover the information included in the Company’s Reliability and Service Quality Reports. The Company supports this recommendation and believes a work group to discuss the simplification, condensing, and/or sunseting of reporting requirements of older and duplicative order points would be beneficial.

CONCLUSION

Xcel Energy is committed to providing our customers with safe, reliable, and quality customer service. We appreciate the thoughtful review of our 2021 Annual Report by the Department and request the Commission accept our 2021 Annual Report on electric safety, reliability, and service quality as detailed in our April 1, 2022 filing.

Dated: June 24, 2022
Northern States Power Company

CERTIFICATE OF SERVICE

I, Christine Schwartz, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States mail at Minneapolis, Minnesota

xx electronic filing

Docket No. E002/M-22-162

Dated this 24th day of June 2022

/s/

Christine Schwartz
Regulatory Administrator

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Alison C	Archer	aarcher@misoenergy.org	MISO	2985 Ames Crossing Rd Eagan, MN 55121	Electronic Service	No	OFF_SL_22-162_22-162
James J.	Bertrand	james.bertrand@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-162_22-162
James	Canaday	james.canaday@ag.state.mn.us	Office of the Attorney General-RUD	Suite 1400 445 Minnesota St. St. Paul, MN 55101	Electronic Service	No	OFF_SL_22-162_22-162
John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd. St, Louis, MO 63119-2044	Electronic Service	No	OFF_SL_22-162_22-162
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_22-162_22-162
Riley	Conlin	riley.conlin@stoel.com	Stoel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-162_22-162
Brooke	Cooper	bcooper@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_22-162_22-162
George	Crocker	gwillic@nawo.org	North American Water Office	PO Box 174 Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_22-162_22-162
John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance	2720 E. 22nd St Institute for Local Self-Reliance Minneapolis, MN 55406	Electronic Service	No	OFF_SL_22-162_22-162
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_22-162_22-162

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Edward	Garvey	edward.garvey@AESLconsulting.com	AESL Consulting	32 Lawton St Saint Paul, MN 55102-2617	Electronic Service	No	OFF_SL_22-162_22-162
Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_22-162_22-162
Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.	445 Etna Street Ste. 61 St. Paul, MN 55106	Electronic Service	No	OFF_SL_22-162_22-162
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2950 Yellowtail Ave. Marathon, FL 33050	Electronic Service	No	OFF_SL_22-162_22-162
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-162_22-162
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-162_22-162
William D	Kenworthy	will@votesolar.org	Vote Solar	332 S Michigan Ave FL 9 Chicago, IL 60604	Electronic Service	No	OFF_SL_22-162_22-162
Thomas	Koehler	TGK@IBEW160.org	Local Union #160, IBEW	2909 Anthony Ln St Anthony Village, MN 55418-3238	Electronic Service	No	OFF_SL_22-162_22-162
Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No	OFF_SL_22-162_22-162
Kavita	Maini	kmains@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_22-162_22-162

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_22-162_22-162
Joseph	Meyer	joseph.meyer@ag.state.mn.us	Office of the Attorney General-RUD	Bremer Tower, Suite 1400 445 Minnesota Street St Paul, MN 55101-2131	Electronic Service	No	OFF_SL_22-162_22-162
Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis	350 S. 5th Street Room M 301 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_22-162_22-162
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_22-162_22-162
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-162_22-162
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_22-162_22-162
Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	OFF_SL_22-162_22-162
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_22-162_22-162
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206 St. Paul, MN 551011667	Electronic Service	No	OFF_SL_22-162_22-162
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_22-162_22-162

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_22-162_22-162
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	OFF_SL_22-162_22-162
Byron E.	Starns	byron.starns@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-162_22-162
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-162_22-162
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_22-162_22-162
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	Yes	OFF_SL_22-162_22-162
Thomas	Tynes	N/A	Energy Freedom Coalition of America	101 Constitution Ave NW Ste 525 East Washington, DC 20001	Paper Service	No	OFF_SL_22-162_22-162
Lisa	Veith	lisa.veith@ci.stpaul.mn.us	City of St. Paul	400 City Hall and Courthouse 15 West Kellogg Blvd. St. Paul, MN 55102	Electronic Service	No	OFF_SL_22-162_22-162
Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine	225 South Sixth Street, Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-162_22-162

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Patrick	Zomer	Pat.Zomer@lawmoss.com	Moss & Barnett PA	150 S 5th St #1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-162_22-162