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August 24, 2022

—Via Electronic Filing—

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

RE: SUPPLEMENTAL FILING
XCEL ENERGY'S 2021 ANNUAL REPORT AND PETITION ON SERVICE QUALITY
PERFORMANCE AND PROPOSED RELIABILITY MEASURES
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 the attached Supplement to the Company's 2021 Service Quality Performance Annual Report and Petition submitted April 1, 2022 in the above-noted docket.

This Supplement provides information in compliance with the Commission's Order Point 9 in its March 2, 2022 Order in Docket No. E002/M-21-237, which requires the Company to submit a supplemental filing 30 days after IEEE publishes the 2021 reliability benchmarking results, comparing the Company's statewide reliability for 2021 to the IEEE benchmarking results. The IEEE 2021 benchmarking results were published on July 25, 2022. In this Supplement, we also update graphs from our April filing on the Company's reliability by work center to reflect the IEEE benchmarking results for 2021.

The Company continues to request that the Commission accept our annual report for 2021, as updated in this Supplement, and approve our proposed reliability standards for 2022 as detailed in our April filing and discussed in this filing.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list. Please contact me at bridget.dockter@xcelenergy.com or (612) 337-2096 or Pamela

Gibbs at pamela.k.gibbs@xcelenergy.com or (612) 330-2889 if you have any questions regarding this filing.

Sincerely,

/s/

BRIDGET DOCKTER
MANAGER POLICY & OUTREACH

Enclosures
c: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Joseph K. 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 2020; AND PETITION FOR
APPROVAL OF ELECTRIC RELIABILITY
STANDARDS FOR 2022

DOCKET NO. E002/M-22-162

SUPPLEMENTAL FILING

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission this Supplement to our April 1, 2022 Annual Report on our safety, reliability, and service quality performance for 2021. We submit this filing in compliance with Order Point 9 in the Commission's March 2, 2022 Order in Docket No. E002/M-21-237, which requires the Company to submit a supplemental filing 30 days after IEEE publishes the 2021 reliability benchmarking results, comparing the Company's statewide reliability for 2021 to the IEEE benchmarking results.

In this Supplement, we show that the Company met the 2021 standards for its Minnesota service territory based on the IEEE benchmarking results for 2021, which were published on July 25, 2022.

As we committed in our April filing, we also provide in this Supplement updated graphs on the Company's reliability by work center to reflect the IEEE benchmarking results for 2021 that are now available. With this additional information, we continue to request that the Commission accept our annual report for 2021, as updated in this Supplement, and approve our proposed reliability standards for 2022 as detailed in our April 1, 2022 filing and discussed below.

SUPPLEMENTAL INFORMATION

I. STATEWIDE RELIABILITY 2021

Order Points 8 and 9 in the Commission's March 2, 2022 Order in Docket No. E002/M-21-237 states:

The Commission hereby 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 center standards at the IEEE benchmarking second quartile for large utilities.

Xcel must file a supplemental filing to its 2021 service quality report 30 days after IEEE publishes the 2021 benchmarking results. The supplemental filing must include an explanation for any standards the utility did not meet.

Supplemental Table A below provides the Company's Minnesota service territory-wide and work center specific reliability for SAIDI, SAIFI, and CAIDI compared to the standards set by the Commission. The standard set by the Commission are the IEEE Distribution Reliability Working Group (DRWG) benchmarking results for 2021 at the second quartile for large and medium utilities.

Supplemental Table A
Minnesota Service Territory Reliability – 2021

		Performance Results	Standards
Minnesota	SAIDI	88.83	139
	SAIFI	0.92	1.09
	CAIDI	96.33	117
Metro East	SAIDI	82.00	139
	SAIFI	0.83	1.09
	CAIDI	98.41	117
Metro West	SAIDI	94.56	139
	SAIFI	1.05	1.09
	CAIDI	89.67	117
Northwest	SAIDI	93.42	136
	SAIFI	0.74	1.08
	CAIDI	126.13	126
Southeast	SAIDI	79.80	136
	SAIFI	0.76	1.08
	CAIDI	105.14	126

As shown, on a Minnesota service territory-wide basis, the Company met the reliability thresholds for SAIFI, SAIDI, and CAIDI for 2021 at the IEEE benchmarking second quartile for large utilities.

Similarly, on a work center basis, the Metro East and Metro West work centers met reliability thresholds for SAIFI, SAIDI, and CAIDI for 2021 at the IEEE benchmarking second quartile for large utilities.

Southeast work center met SAIFI, SAIDI, and CAIDI reliability thresholds for 2021 at the IEEE benchmarking second quartile for medium utilities. Northwest work center met medium utility reliability thresholds for SAIFI and SAIDI, while performing in the third quartile for CAIDI benchmark.

The single measure that did not meet the 2021 IEEE benchmarking thresholds is CAIDI for Northwest work center (Updated Graph 29). Northwest work center CAIDI surpassed the second quartile benchmark slightly by 0.13 minutes. As stakeholders likely recall, CAIDI is a measure of how SAIDI and SAIFI compare to one another (essentially, if a customer experiences one outage, approximately how long is that outage). The Northwest work center covers a large, primarily rural area which results in longer response times from the crew. With longer response and

restoration times this directly impacts CAIDI. In considering the Company's CAIDI performance at this work center, it's important to note that the Company's SAIFI and SAIDI metrics in the Northwest work center were within the first quartile.

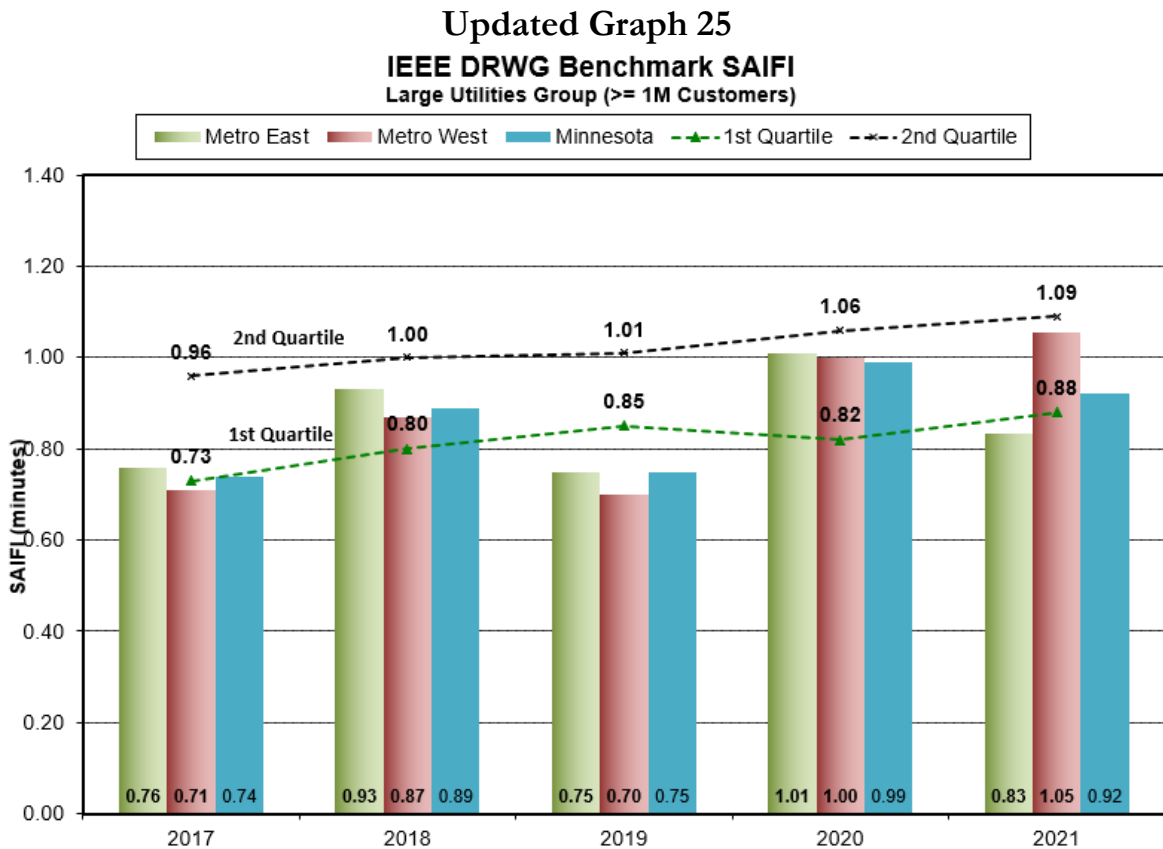
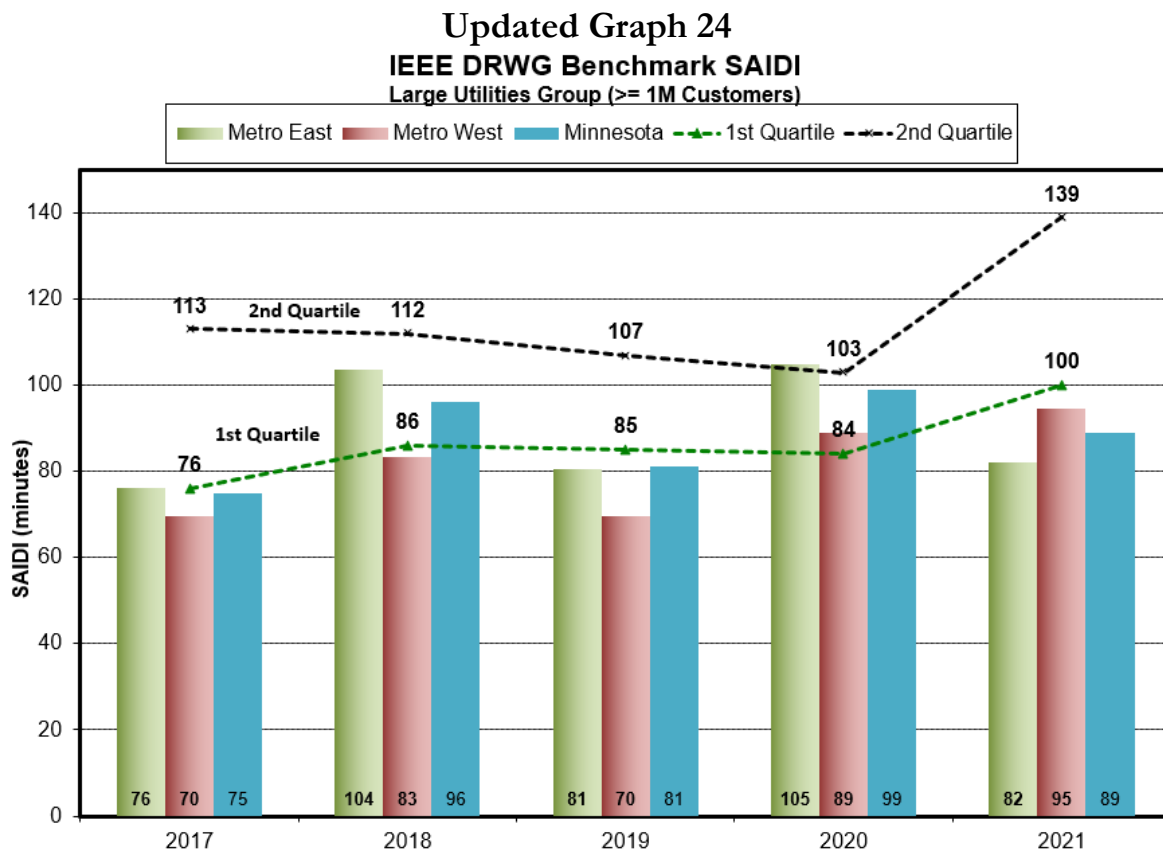
We have provided information around the Northwest work center in our April filing. Graph 1C identifies top outage causes for the Northwest work center in 2022. Graphs 11, 12, & 13 show the five-year trend of all three indices along with top level and cause of outages from the current year. Table 15 lists transmission and distribution events along with Major Event Day and moderate storm activity information. Upon review of that information, we believe those discussions address the reasons for missed thresholds compared to IEEE benchmarking results.

II. PROPOSED RELIABILITY STANDARDS FOR 2022

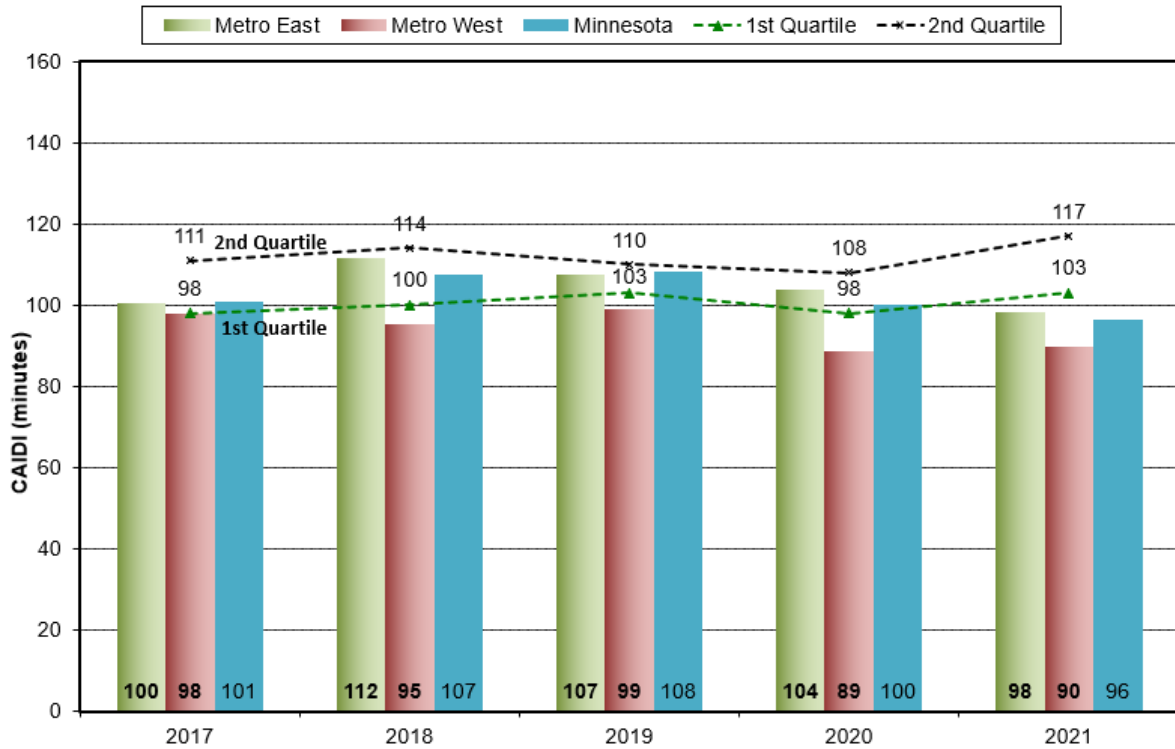
In our Annual Report and Petition, we proposed reliability standards for 2022, as required under Minn. R. 7826.0600. Specifically, we proposed a benchmarking standard for each work center similar to the standard the Commission set for Minnesota overall. For the Company's two large metro regions, we proposed the IEEE benchmark for large utilities. This would be the same standard as utilized for Minnesota. For the two more rural areas of the Northwest and Southeast work centers, we proposed the IEEE benchmark for medium utilities. The standard for all proposals is to achieve metrics at or better than the second quartile.

Because our proposed reliability standards for 2022 are based on IEEE benchmarking results that will be published in 2023, we provided graphs in our Annual Report showing historic reliability by work center compared to IEEE benchmarking results for 2017-2021. With the 2021 IEEE results now available, this Supplement updates Graphs 24 through 29 from our April filing to include the applicable 2021 IEEE benchmarking results for each work center for SAIDI, SAIFI and CAIDI. Updated Graphs 24, 25, and 26 provide the large utility data for our Metro West and Metro East work centers, as well as for our Minnesota service territory overall.¹ Updated Graphs 27, 28, and 29 provide the medium utility data for our Southeast and Northwest work centers.

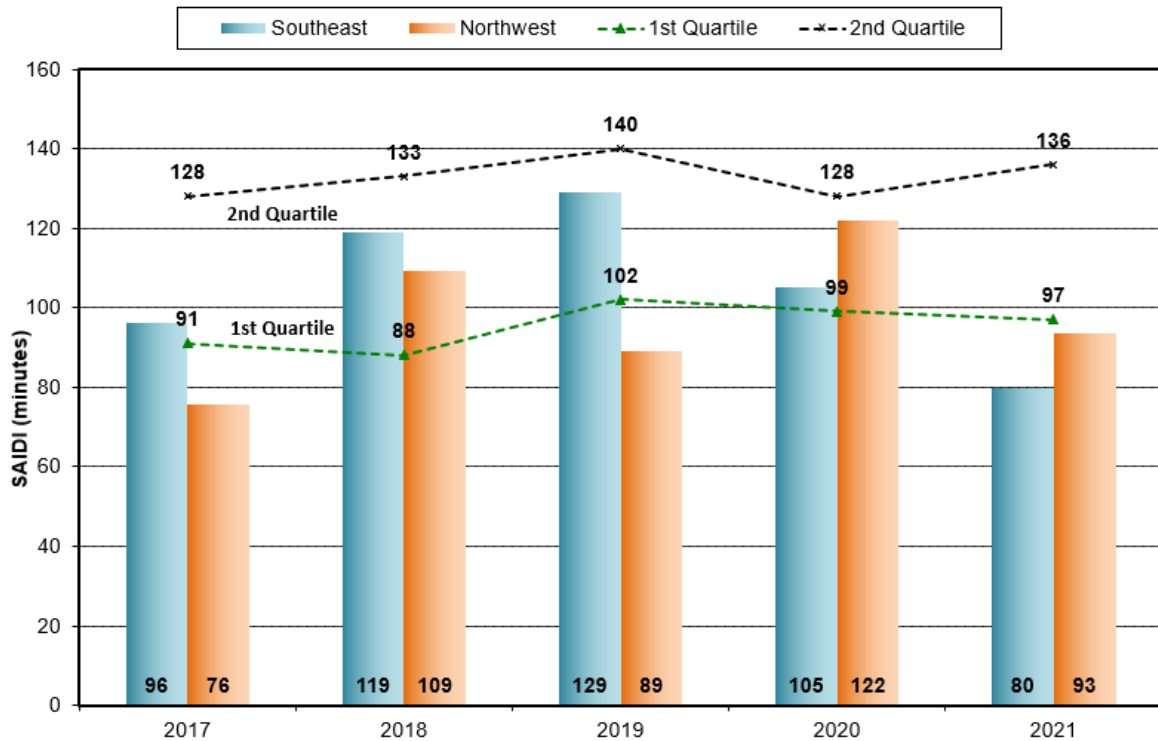
¹ In our April filing, we provided separate graphs showing reliability for the NSPM operating company (Graphs 2, 3, and 4 in our April filing). However, in this Supplement we only update the graphs related to reliability for our Minnesota service territory, which is the reliability data relevant to the state-wide standards established by the Commission.



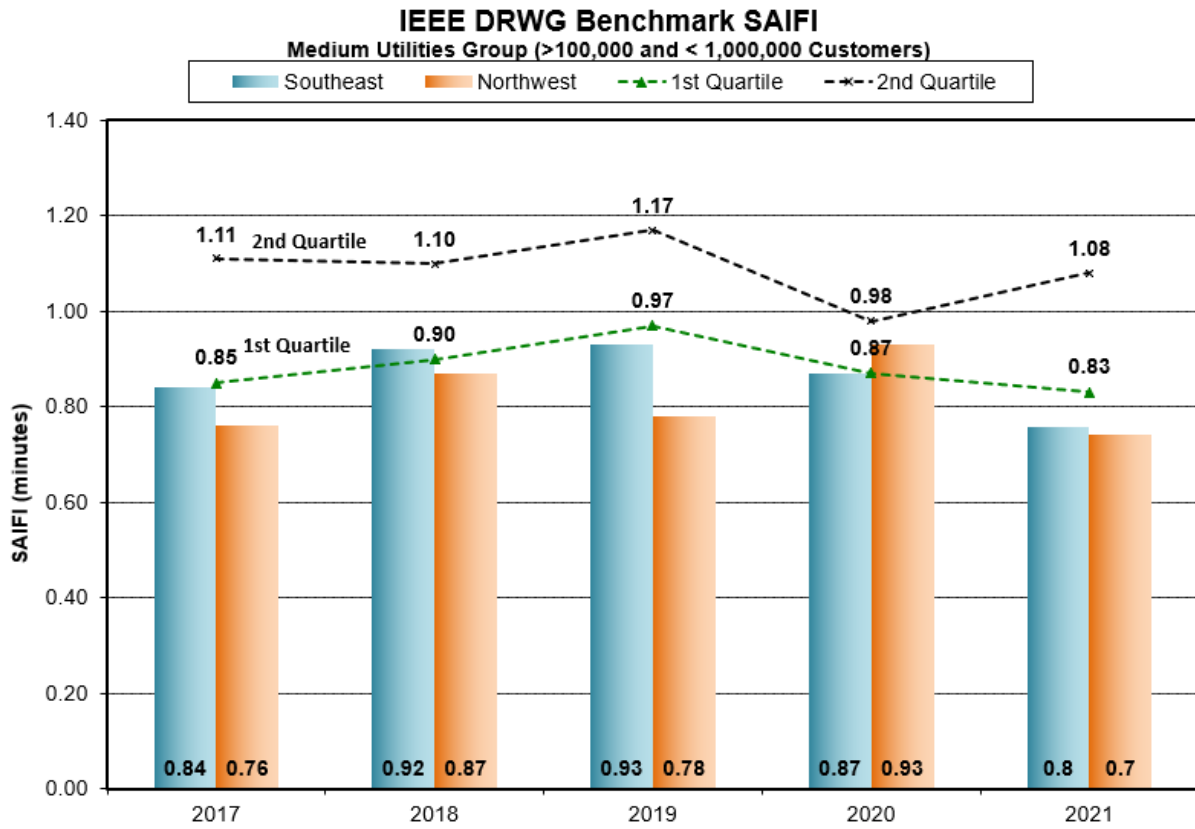
Updated Graph 26
IEEE DRWG Benchmark CAIDI
 Large Utilities Group (>=1M Customers)



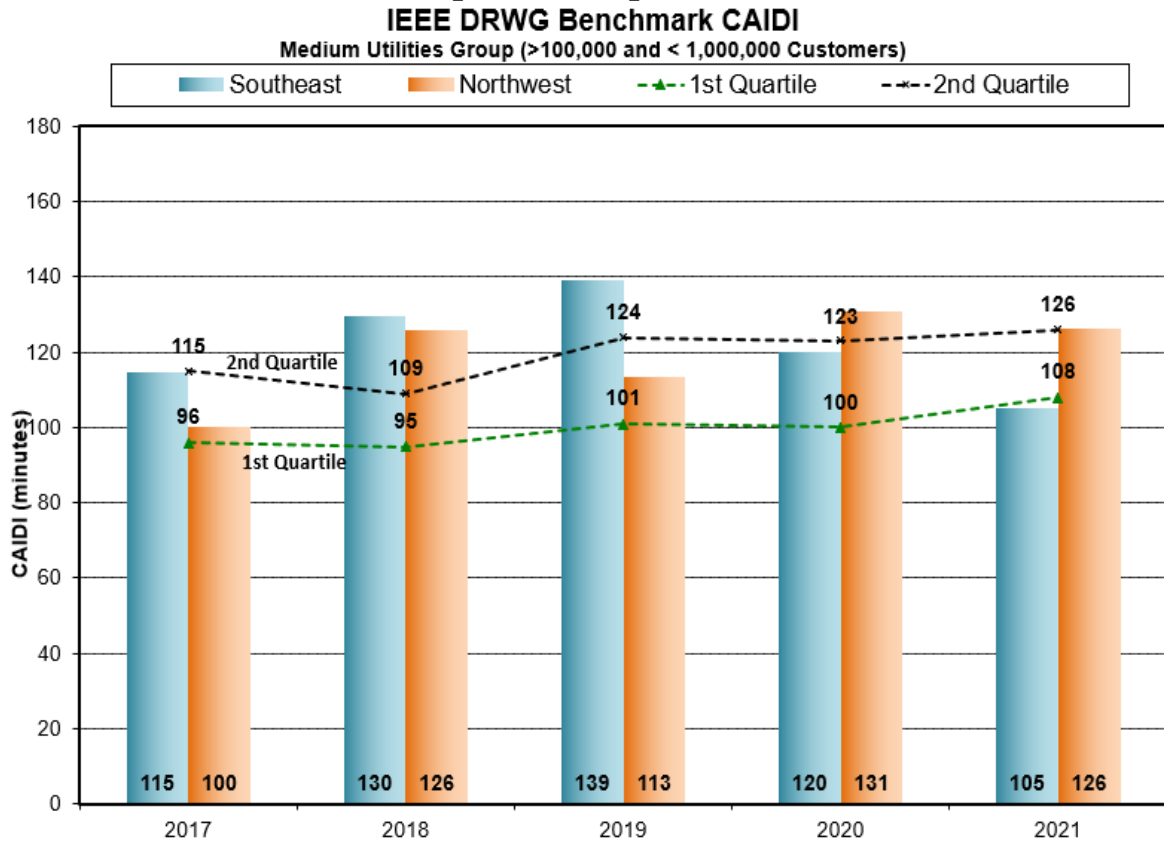
Updated Graph 27
IEEE DRWG Benchmark SAIDI
 Medium Utilities Group (>100,000 and < 1,000,000 Customers)



Updated Graph 28



Updated Graph 29



As shown in these graphs, the Company met 11 of the 12 standards for the work centers.

In 2021 the Company transitioned to utilizing the nationally recognized IEEE Distribution Reliability Working Group survey to benchmark our performance for the purposes of setting standards for SAIDI, SAIFI, and CAIDI. Applicable IEEE benchmarking results are used to set work center reliability standards for 2022 based on second quartile performance levels. Comparisons are not perfect because each utility, and indeed each work center for the Company, is unique relative to such things as infrastructure, system layout, operating structure, and weather patterns. While recognizing significant differences exist in performance capabilities of various utilities, a better-than-average (i.e., second quartile or better) reliability performance of a utility compared to its peers suggests that the utility is attentive to providing quality service performance to its customers.

At the same time, we recognize that missing the second quartile benchmarking standard for a given year may not necessarily be indicative of systemic reliability issues in a particular work center. However, tracking of performance over time compared to benchmarking results may however highlight possible reliability issues. We would pay close attention to these results and would assess in detail work center performance and operations where specific standards are not met.

Given the IEEE benchmarking results for 2021, we will continue to use the applicable benchmarking standards for each work center. We support standards at the second quartile of the IEEE benchmark for large utilities for our Metro East and Metro West work centers, and at the second quartile of the IEEE benchmark for medium utilities for our Northwest and Southeast work centers.

CONCLUSION

We submit this supplemental filing in compliance with Commission order, and we appreciate the opportunity to include this updated information for our Annual Report. We respectfully request that the Commission accept our Annual Report on safety, reliability, and service quality, as updated by this Supplement. We also continue to request that the Commission approve our proposed reliability standards for 2022 as detailed in our April filing and discussed in this Supplement.

Dated: August 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 August 2022

/s/

Christine Schwartz
Regulatory Administrator

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