

October 24, 2022

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

**RE: Minnesota Department of Commerce, Division of Energy Resources – Supplemental
Comments Regarding Xcel Energy’s 2021 Annual Service Quality Report**
Docket No. E002/M-22-162

Dear Mr. Seuffert:

In comments filed June 2, 2022, in this docket, the Minnesota Department of Commerce, Division of Energy Resources (Department) requested that Northern States Power Company d/b/a Xcel Energy (Xcel or the Company) provide information in its reply comments regarding 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 stated it would make final recommendations on the Company’s Annual Service Quality Report after reviewing Xcel’s reply comments.

On June 24, 2022, the Company submitted its reply comments. Xcel provided additional information regarding staffing related to the five items listed above.

The Department recommends the Commission approve the customer service aspect of this filing.

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The Department is available to answer any Commission questions.

Sincerely,

/s/ JOHN KUNDERT
Financial Analyst

JK/ja
Attachment



Before the Minnesota Public Utilities Commission

Supplemental 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 supplemental 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.

In our initial comments in this docket, the Department recommended the Commission accept the Company's 2021 Safety Report and requested 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 suggested 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.

On June 24, 2022, the Company submitted its reply comments. Xcel provided additional information regarding staffing related to the five items listed above. The Company also supported the Department's suggestion the Commission consider initiating a work group to review and simplify the different reporting requirements included in the various Commission Orders that pertain to this filing requirement.

II. ANALYSIS

The Department's analysis follows the bullet points contained in the previous section.

A. *COMPARISON OF JD POWER SURVEY RESULTS FOR 2020 AND 2021*

The Department requested the Company provide additional discussion about why Xcel's customer satisfaction levels are not increasing in any of the seven metrics. Xcel did provide a correction to its 2021 Customer Contact Index Score which increased that score by 14%. This correction alleviates much of the Department's concerns regarding the 2021 JD Power results.

The Company did not provide a hypothesis as to why its customer satisfaction levels are not increasing in any of the seven metrics. That said, the Department has no additional comments on this issue. The Commission may want to review this issue with the Company at some point in the future.

B. *COMPARISON OF 2020 AND 2021 COMMERCIAL CLASS SERVICE INSTALLATION TIMES*

The Department asked the Company to explain this issue in reply comments. Xcel did provide this information. The Company identified four drivers for this change.

- Permitting
- Customer Delays
- Supply Chain Issues
- Design Resource Issues

The Department appreciates Xcel's explanation for this degradation between 2020 and 2021 for this performance metric and has no additional comments on this issue.

C. *ORDER POINT 10 OF COMMISSIONS'S MARCH 2, 2022, IN DOCKET NO. E002/M-21-237 – ADDITIONAL INFORMATION*

Xcel noted the Company will file this information as part of its Rebuttal Testimony on November 8, 2022, in the Company's MN Electric Rate Case, Docket No. E002/M-21-630.

The Department has no additional comments on this issue.

D. *COMPARISON OF MYACCOUNT/MOBILE APPLICATION INSTALLATIONS AND EMAIL INTERACTIONS BETWEEN 2020 AND 2021*

The Department asked the Company to discuss 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.

In its reply comments, the Company provided additional information as the Department requested. Xcel noted significant revisions to its 2020 and 2021 results. Tables 1 and 2 summarize this information.

Table 1 – Comparison of 2020 Original and Revised Website Visits and My Account + Mobile App

Description	Original	Revised	Difference	Percentage Change
Website Visits	12,681,427	12,673,590	-7,837	-.01%
My Account + Mobile App	19,432,738	15,910,472	-3,522,266	-18%

Table 2 – Comparison of 2021 Original and Revised Website Visits and My Account + Mobile App

Description	Original	Revised	Difference	Percentage Change
Website Visits	11,098,531	14,351,582	3,253,051	29%
My Account + Mobile App	14,626,276	17,818,268	3,191,992	22%

Xcel explained that during the review of this information for its reply comments, staff identified a “discrepancy in the manner the data has been collected.”¹ The Company also noted the number of website and My Account + Mobile App interactions increased from 2020 to 2021. Table 3 summarizes that information.

Table 3 – Comparison of 2020 and 2021 Revised Website Visits and My Account + Mobile App

Description	Original	Revised	Difference	Percentage Change
Website Visits	11,098,531	14,351,582	3,253,051	29%
My Account + Mobile App	14,626,276	17,818,268	3,191,992	22%

The Department appreciates the Company’s efforts to resolve this issue and has no additional comments on this topic.

E. RELIABILITY INFORMATION – PROCESS FOR RECEIVING THIS INFORMATION IN AN ELECTRONIC FORMAT

The Department requested the Company provide additional information on this issue. Xcel complied with the Department’s request.

¹ Reply comments at page 6.

The Department has no additional comments on this issue.

III. RECOMMENDATIONS

The Department recommends the Commission approve the customer service quality component of Xcel's 2021 service quality and service reliability filing.

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
Supplemental Comments**

Docket No. E002/M-22-162

Dated this **24th** day of **October 2022**

/s/Sharon Ferguson

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