

Staff Briefing Papers: Volume 2/2

Meeting Date	November 3, 2022	Agenda Item 1*
Company	Northern States Power Company d/b/a Xcel Energy, Minnesota Power, and Otter Tail Power Company.	
Docket No.	Minnesota Power E015/ M-22-163 Otter Tail Power Company E017/ M-22-159 Xcel Energy E002/ M-22-162	
	In the Matter of Minnesota Power's, Otter Tail Power Company's, and Xcel Energy's 2020 Annual Safety, Reliability and Service Quality Report and Proposed SAIFI, SAIDI, and CAIDI Reliability Standards for 2021	
Issues	<ol style="list-style-type: none">1. Should the Commission accept Minnesota Power's, Otter Tail Power Company's, and Xcel Energy's 2021 Safety, Reliability, and Service Quality Metrics Reports?2. Are the utilities' reports consistent with recent Orders¹ and Minn. Rules Ch. 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?	
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¹ See Orders associated with Docket Nos.: Xcel Energy (E002/M-21-237 and E002/M-20-406); Minnesota Power (E015/M-21- 230 and E015/M-20-404); Otter Tail Power (E017/M-21-225 and E017/M-20-401).

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The attached materials are work papers of the Commission Staff. They are intended for use by the Public Utilities Commission and are based upon information already in the record unless noted otherwise.



Relevant Documents

Date

Annual Report, Otter Tail Power	April 1, 2022
Annual Report and Appendices A & B, Minnesota Power	April 1, 2022
Annual Report parts 1 & 2 and ATTL K & L, Xcel Energy	April 1, 2022
Errata, Corrected Call Center Response Time, Xcel Energy	April 28, 2022
Errata, Corrected JD Power index scores and Electronic Access data, Xcel Energy	June 24, 2022
Comment, Department of Commerce, to 22-159 (OTP)	May 16, 2022
Comment, Department of Commerce, to 22-163 (MP)	May 26, 2022
Comment, Department of Commerce, to 22-162 (Xcel)	June 2, 2022
Correct Public [Version of] Comments originally filed 6-2-2022, Department of Commerce, to 22-162 (Xcel)	June 7, 2022
Reply, Otter Tail Power	May 26, 2022
Reply, Minnesota Power	June 15, 2022
Reply, Xcel Energy	June 24, 2022
Letter, Department of Commerce, to 22-159 (OTP)	September 20, 2022
Amendment to SRSQ Report, to 22-159 (OTP)	September 26, 2022
Supplemental Comments, Dept. of Commerce, to 22-162 (Xcel)	October 24, 2022
IEEE Supplemental Filing to 22-159 (OTP)	August 25, 2022
Compliance Filing to 22-163 (MP)	August 29, 2022
Supplement- IEEE Reliability Benchmarking, to 22-162 (Xcel)	August 24, 2022

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I. Statement of the Issues

1. Should the Commission accept Minnesota Power's, Otter Tail Power Company's, and Xcel Energy's 2021 Safety, Reliability, and Service Quality Metrics Reports?
2. Are the utilities' reports consistent with recent Orders² and Minn. Rules Ch. 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?

II. Introduction

Minnesota's Electric Investor-Owned Utilities (IOUs; Minnesota Power (MP), Xcel Energy (Xcel) and Otter Tail Power Company (OTP)) submit Safety, Reliability, and Service Quality (SRSQ) Reports annually. Standards and reporting requirements are set under Minn. Rules, Chapter 7826, and in Commission Orders.

In its March 2, 2022, Order Accepting Reports and Setting 2021 Reliability Standards, the Commission set utility reliability standards that benchmark to the IEEE working group results. The Commission required utilities make a supplemental filing to their April 1, 2022, reports within 30 days of the IEEE results being available, with an explanation addressing any standards the utility did not meet.

The COVID-19 Pandemic continued to impact customers and / or utility service in 2021. Beginning in March 2020, during Governor Walz's COVID-19 pandemic peacetime emergency declaration, the Commission issued a moratorium on utility disconnection of residential customers.³ Utilities were allowed to resume normal service for residential customers by sending disconnection notices in June 2021 and resuming disconnection for nonpayment in August 2021.⁴ Staff inspected trends in utility service and customer care following the resumption of normal service though noting the lives of many and utility operations were still to some degree impacted by the Pandemic in 2021. Note, detailed monthly reports on residential customer status were filed in Docket No. E,G999/CI-20-375, ending with data for April 2022. Reporting continues monthly in Docket No. YY-02 (i.e. current data are reported in Docket No. 22-02).

All three investor-owned electric utilities filed annual safety, reliability, and service quality reports on April 1, 2022. By June 2, 2022 the Department was the only group to comment on

² See Orders associated with Docket Nos.: Xcel Energy (E002/M-21-237 and E002/M-20-406); Minnesota Power (E015/M-21-230 and E015/M-20-404); Otter Tail Power (E017/M-21-225 and E017/M-20-401).

³ Commission Letter, Responsive Measures to the Outbreak of COVID-19, filed March 25, 2020 and then Order Establishing Peacetime Emergency Requirements and Modifying Reporting Requirements filed August 13, 2020 both into Docket No. E, G-999/CI-20-375.

⁴ Order Adopting Broad Transition Plan Proposal, Suspending Negative Reporting, and Establishing Notice and Communication Requirements issued May 26, 2021 in Docket No. E, G-999/CI-20-375.

the filings. While the Department recommended acceptance of utilities' safety portion⁵ of annual reports, the Department also requested discussion of outstanding service quality issues from each utility in their reply comments. All utilities responded to the Department by June 24, 2022. Upon review of replies, on September 20, 2022 the Department filed a letter stating that it found OTP's responses adequate and recommended approval of the Customer Service portion of OTP's filing.⁶ Later, on October 24, 2022 the Department recommend approval of the customer service aspect of Xcel's filing.⁷ At the time of the filing of this briefing paper, the Department had yet to make a final recommendation on MP's annual report.

Staff includes the additional information Ordered as per Commission decisions on utilities' 2020 data (Table 1). Staff will expound on these ordered items in the next sections.

Table 1. Service Quality Reporting Data Ordered After 2020 Data Were Filed

Order Point	Reporting Standard	Details	See Page
2&3	7826.1700 & .2000 Call Center Response Times & Customer Complaints	Utilities were ordered to provide percentage uptime and error rate percentage information in their annual reports for the next three reporting cycles, to build baselines for web-based service metrics. To be reported in 2023.	X
4	7826.1700 & .2000 Call Center Response Times & Customer Complaints	Utilities were ordered to continue to provide information on electronic utility-customer interaction such that baseline data are collected. Data required are yearly total number of website visits; logins via electronic customer communication platforms; emails or other customer service electronic communications received; and categorization of email subject, and electronic customer service communications by subject.	
5	7826.1700 Call Center Response Times	Xcel Energy was required to provide additional information in its 2022 filing on progress made hiring new call center representatives in 2021 and the effects of those new employees on its agent only metrics.	
6	7826.2000 Customer Complaints	Xcel Energy was required to add a "DER Complaint" reporting subcategory, following discussion with and input from the Complaint working group.	
7		Minnesota Power, Otter Tail Power, and Xcel Energy were required to file public facing summaries and publish summaries in locations visible to consumers.	

⁵ Staff interprets this to mean "Safety and Reliability" but the Department may wish to confirm.

⁶ Letter Recommending Approval of 2021 Annual Service Quality Report, Department of Commerce, September 20, 2022, Docket No. E017/M-22-159

⁷ Department of Commerce Supplemental Comments Docket No. E002/M-22-162 filed Oct. 24, 2022.

		Minnesota Power committed to providing data on its Reconnect Pilot Program, Order December 9, 2020 in Docket No. E015/M-19-766	
16		After consultation with Department and Commission staff, each utility must file revised categories for reporting complaint data. The Commission hereby delegates authority to the Executive Secretary to approve additional reporting categories* Following 2019 filing Docket Nos. E002/M-20-406; E015/M-20-404; E017/M-20-401	

Orders in 2020 SRSQ Reports, December 2, 2021, Docket Nos. E002/M-21-237; E015/M-21-230; E017/M-21-225, unless highlighted in grey.

III. Context

Otter Tail Power Company (OTP) serves over 123,500 customers across 70,000 square miles in Minnesota and the Dakotas, primarily in rural and agricultural areas. OTP serves 422 communities that have an average population of 400 residents. One third of revenues are received from residential customers. OTP did not mention any continued, negative impacts from the COVID-19 pandemic pertaining to service in 2021.

Minnesota Power (MP) serves over 145,000 residential (13% of sales) and commercial (14% of sales) customers as well as many large industrials across 26,000 square miles in mainly rural, eastern Minnesota. In 2021, MP explained continued impacts from the COVID-19 Pandemic: supply chain disruptions; increased pricing; delivery delays; and workforce shortages in 2021 and continued to return to operations as the COVID-19 pandemic evolved.

Xcel Energy (Xcel) serves 1.3 million customers, of which over 96% are residential customers and many live in the Twin Cities metro area. Xcel mentioned meter reading staff absences, delays to in-home customer service due to safety concerns, and economic challenges, including supply chain issues impacting service extensions, call center staffing, and perhaps, preferred method of customer interaction, all related to the COVID-19 pandemic in 2021.

IV. Reporting Standards

Minnesota Rules 7826 requires a variety of reporting by electric utilities. Briefing papers Volume 1 will address safety and reliability. This set of briefing papers, Volume 2, will address utility service quality. Both volumes will end with an identical set of decision options.

A. 7826.1400 Meter Reading Performance

MN Rules set a utility performance standard in which at least 90% of customer meters must be read April – November and at least 80% of meters are read December – March.⁸ MN Rules also outline utilities' annual reporting expectations with respect to meter reading. Table 2 shows compliance with these expectations.

⁸ MN Administrative Rules 7826.0900 Meter Reading Frequency; Customer Accommodation, Subpart 1.

Table 2. Reporting Required by MN Rule 7826.1400

	#, % Meters Read by Utility	#, % Meters Self- Read	Meters Not Read 6-12 and 12+months	Explanation for Meters Not Read	Monthly Meter Reading Staffing Levels
OTP	✓	✓	✓	✓	✓
MP	✓	✓	✓	✓	✓
Xcel	✓	✓	✓	✓	✓

A check mark (✓) indicates the required data were included in the utility's annual report filed April 2022.

The Department acknowledged OTP, MP, and Xcel's fulfillment of the requirements of Minnesota Rules.⁹ Further, staff notes that in both 2020 and 2021 OTP, MP, and Xcel exceeded standards set out in MN Rules.

Reporting on Meters Read

- OTP personnel read 95.9% or more of meters system-wide each month in 2021.
- MP personnel read 94.3% of residential meters each month and on average, read 99% of commercial, industrial, pumping, and lighting meters each month in 2021.
- Xcel personnel read 99.6% or more of meters system-wide each month in 2021.

Reporting on Meters Not Read

OTP and MP record individual meters that are not read for 6-12 months or for 12+ months over the course of a year. If a meter that had previously been unread for 6-12 months in a year continues to be unread for 12+ months, that meter would fall into the most applicable (i.e. longer) timeframe. Monthly, Xcel counts in the same way as MP and OTP. Each reported monthly figure represents an independent count of individual meters attempted to be read; for example, if a meter could not be read in June or July that meter would appear in each month's count.¹⁰ Then, and unlike MP and OTP, the total meters unread that Xcel reports is a summation of all individual meters unread each month which, creates the total unread meters per year. This means that the same meter might appear multiple times in Xcel's annual total if that meter were unread for multiple months. Compared to OTP and MP, Xcel's annual total is likely to appear inflated.

Staff Request. To allow for comparisons of meter reading performance across utilities and based on number of customers as well as to accurately represent Xcel's performance, Staff

⁹ Comments, Department of Commerce, Docket No. E017/M-22-159 filed May 16, 2022, p16. Comments of the Minnesota Department of Commerce, Division of Energy Resources Docket No. E015/M-22-163, filed May 26, 2022, p13-14. Comments of the Minnesota Department of Commerce, Division of Energy Resources Docket No. E002/M-22-162, filed June 2, 2022, p6.

¹⁰ Xcel initial filing: 2021 ANNUAL REPORT AND PETITION SERVICE QUALITY PERFORMANCE AND PROPOSED RELIABILITY MEASURES Part 1 made April 1, 2022 docket no E002/M-22-162, p3. Xcel reports, for each month, "the number of actual attempts to read meters (with a reason why this was not successful, skip code) and the number of meters we did not attempt to read at all ("No Read Returned"). Accordingly, for each month, the tables list the unique number of meters, but the same meter may appear in a table over several months."

requests Xcel provide one additional data set that reports discreet meters unread for 6-12 months and 12+ months. Xcel's annual total meters read would thus reflect each unique meter once, reported exclusively in the most appropriate timeframe (**Decision Option XX**).

OTP The number of meters not read for 6-12 months declined from 52 meters in 2020 to 23 meters in 2021 (~56% change). Staff acknowledges this improvement, but that OTP has not yet returned to pre-pandemic levels. Indeed, in 2017 no meters were unread for 6-12 months, in 2018 two meters were unread, and in 2019, two meters. Meters not read for 12+ months has remained zero for several years.

MP The number of meters not read for 6-12 months declined to resemble pre-pandemic numbers with MP reporting that 50 meters went unread for 6-12 months in 2021 compared to 132 meters in 2020 (a 62% change), 47 meters in 2019, and 20 meters in 2018. For MP no meters went unread longer than 12 months. Staff also wishes to note that the number of meters read by MP customers has remained steady over the past 5 years, but dropped to 69.1 in 2021. This represents the lowest average number of meters read by customers since 2015.

Department Comment on MP. The Department noted downward trends for MP, compared to 2020, for meters read by the customer and meters not read for 6-12 months, both positive trends.¹¹

Xcel Like MP, meters read by Xcel customers dropped down to pre-2020 numbers, with 61 meters read by customers in 2021 compared to 125 meters in 2020, 85 meters in 2019, and 65 meters in 2018. Considering meters not read, 3,388 total meters (2,235 residential, 809 commercial, 250 industrial, and 4 "other" meters) were not read for a period of 6- 12 months during 2021. In 2020, 3,146 meters were unread for 6-12 months; in 2019, 4,371 meters; in 2018, 4,074 meters; and in 2017, 3,412 meters were unread for 6-12 months. Thus, Xcel's performance in 2021 was largely in line with pre-pandemic values.

The number of meters not read by Xcel for 12+ months, however, has been increasing for several years. In 2021, Xcel reported 639 residential, 674 commercial, 722 industrial, and 20 "other" meters went unread longer than 12 months (see Department's table, reproduced below). For all unread meters, the most frequent explanation given was "No Read Returned" meaning Xcel did not attempt to read the meter, for reasons like prioritizing resources and weather conditions.¹²

Prioritizing resources was explained in Xcel's discussion of supply chain issues which, impacted "ability to receive and exchange meters/modules that were not transmitting. The inability to exchange the meters/modules led to an increased number of manual read requests that we [Xcel] are not staffed to cover, resulting in a significant increase in No Read Return estimates." Similarly, during the first months of the Pandemic in 2020, Xcel suspended field readings and

¹¹ Comments of the Minnesota Department of Commerce, Division of Energy Resources Docket No. E015/M-22-163, filed May 26, 2022, p13-14.

¹² Xcel initial filing: 2021 ANNUAL REPORT AND PETITION SERVICE QUALITY PERFORMANCE AND PROPOSED RELIABILITY MEASURES Part 1 made April 1, 2022 docket no E002/M-22-162, p3.

meter exchanges and repairs. Upon returning to the field staffing levels were insufficient to read the many meters that needed to be read which led to the increase in categorization of meters as No Read Returned skips.¹³

Department Comment to Xcel. The Department acknowledged the slight decrease in meters read by utility staff was consistent with the ongoing difficulties the Company said it faced related to supply chain issues and other factors.¹⁴

Department analyses also showed that, “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.” However, the Department was concerned with the “not very good” number of meters unread for 12+ months. The Department intends to monitor the 2022 data hoping that, “the 2022 figures are a significant improvement over the 2021 results.” Staff reproduces the Department’s table below. Staff also notes that the Department commented that the number of commercial meters not read for 12+ months, “increased 48%”; however, after reviewing Xcel’s data, staff believes the Department meant to communicate that the number of meters not read for 12+ months decreased slightly from 2020 but was still *~48% greater than the 10-year average*. Similarly, the number of industrial meters not read for over a year was 204% greater than Xcel’s 10-year average, not a 204% increase.¹⁵

Staff Reproduces Department’s Table, below.

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%

Staff Analysis. To build on the Department’s analysis of meters not read for 12+ months, staff focused on Xcel’s citation of “No Read Return” as the most common reason for why meters were not read for 6-12 and 12+ months across all customer types. According to Xcel, meters are coded as “No Read Returned” when meter reading staff do not attempt to read meters for reasons like weather and resources. Considering the frequency of “No Read Returned” codes, Xcel’s current field staffing levels may be insufficient to avoid unread meters

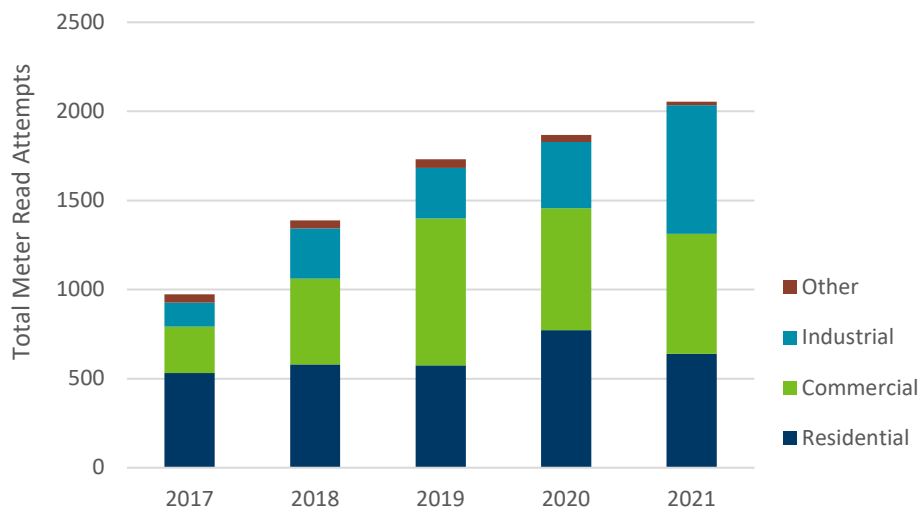
¹³ Xcel initial filing made April 1, 2021 docket no E002/M-21-237, p70.

¹⁴ Comments, Department of Commerce, Docket No. E002/M-22-162 filed June 2, 2022, p5.

¹⁵ This section discussing Comments, Department, Docket No. E002/M-22-162 filed June 2, 2022, p6.

for six to 12+ months. Staff intends to continue to monitor the number of meters unread for 12+ months (see Fig. 1) but acknowledges the high levels of meters read by utility personnel, above 96% for 2017-2021 which, fulfills MN Rules 7826.1400.

Figure 1: Xcel Meters Unread for 12+ Months



Xcel sums all individual meters unread each month to create the total unread meters per year.

Meter Equipment

OTP The Company's initial filing stated that it did not have Advanced Metering Infrastructure (AMI). However, the filing also explained, in the context of its new Outage Management System to improve reliability, that OTP had petitioned for recovery of a new AMI system. On August 4, 2022 the Commission approved OTP's AMI project for tracker recovery and approved a soft cap on the project of \$55.9 million, less certain costs. Updates will be received in OTP's next Electric Utility Investment Cost (EUIC) rider petition, in which OTP must propose and establish performance metrics to track the AMI Project.¹⁶

MP In 2021 while field readings were suspended as a safety precaution during the COVID-19 Pandemic, like in 2020, MP refocused field staff on AMI installations.¹⁷ MP reported that they no longer have any mechanical meters, have decreased the percent hybrid meters (3.72% total) since 2020, and that 96% of meters are AMI (increase of 12% since 2020).¹⁸

After being delayed in 2020, MP's Remote Reconnect three-year voluntary pilot began operation, using AMI meters provided at no cost by the Company.¹⁹ Disconnected participants

¹⁶ ORDER APPROVING TRACKER AND SETTING ADDITIONAL REQUIREMENTS issued August 4, 2022 Docket No. E-017/M-21-382.

¹⁷ MP initial filing, p14 discusses redeployment of employees.

¹⁸ MP initial filing, p55.

¹⁹ Pilot proposed in Docket No. E-015/M-19-766. Proposal approved by Commission December 9, 2020.

are reconnected without an associated fee (normally \$20 in business hours and \$100 outside). MP shared Pilot data in the instant docket per the Order approving the Pilot.²⁰ In 2021, there were 3,731 participants in the Remote Reconnect Pilot, 904 of whom were LIHEAP customers. Fifteen customers opted out of having an AMI meter. The Pilot did not result in net savings its inaugural year but instead had \$464,000 of expenditures based on cost of remote-capable meters. The average disconnection length was six days, compared to eight days outside of Pilot.

Department Response to MP Reconnect Pilot. “The Company represented this Pilot as essentially an efficiency gain for both ratepayers and shareholders. MP would invest in more advanced meters (a capital expenditure) resulting in reduced ongoing labor costs. While the 2021 partial year results are not entirely supportive of that narrative, the differences are apparently due to timing. The Company estimated the Pilot’s partial year incremental cost/benefit to be a negative \$464,000 (costs were greater than benefits). MP incurred the cost of installing the new technology but did not have a full year (or two or longer) to realize the benefits associated with the investments in the new meters. The Department concludes Minnesota Power appears to have fulfilled the requirements of the Commission’s December 9, 2020 Order in Docket No. E015/M-19-766.”²¹

Xcel utilizes Cellnet’s Automated Meter Reading (AMR) service by which customer usage data are transmitted to the Company. Field personnel are only dispatched if meters do not generate an automated reading for two consecutive months. The Company also reported that, “Advanced Metering Infrastructure (AMI) is expected to provide improvements that will give the Company insight into customers’ outages sooner. The Company is currently planning to deploy the integration between AMI and outage management system in 2022.”²² Staff notes that per Xcel’s Time of Use rate design pilot, complete AMI rollout is anticipated for the end of 2024. Staff understands supply chain issues have hampered rollout.²³

Meter Reading Staff

OTP reported fewer meter reading staff (52, compared to between 71 and 72 staff working each month in 2020) for service to Minnesota customers. However, OTP exceeded MN Rules performance standard. This decrease was explained as Minnesota customers formerly serviced by out-of-state service centers were consolidated to in-state customer service centers and with that, out-of-state employee counts are no longer included in total employee counts. In 2020, OTP reported an increase in towns being served by a third-party meter reader (94 towns), explained with the retirement of a full-time meter-reader employee. In 2021, 92 towns were served by a third-party meter reader, as OTP resumed reading meters in two communities.

²⁰ MP initial filing, p69-73.

²¹ Comments of the Minnesota Department of Commerce, Division of Energy Resources Docket No. E015/M-22-163, filed May 26, 2022, p24.

²² Xcel Energy initial filing Docket No. E002/M-22-162, April 1, 2022 part 2, p37. Also, Docket No. 17-775.

²³ COMPLIANCE FILING- Pilot Programs GENERAL TIME OF USE Service Tariff DOCKET NO. E002/M-20-86 filed January 18, 2022, p24.

MP For each month in 2021, MP employed between four and six meter-reading staff persons. On average, this is one fewer staff person than was reported in 2019 and 2020 yet, MP still exceeded MN Rules performance standards.

Xcel For each month in 2021, Xcel employed between 11.5 and 12.5 meter-reading staff persons, consistent with what was reported in 2019 and 2020.

B. 7826.1500 Involuntary Disconnections

Table 3. Reporting Required by MN Rule 7826.1500

	# Customers receiving disconnect notices	# Customers seeking and granted CWR protection	# Involuntary disconnects and # Restored in 24 hours	# Involuntary disconnects restored with a payment plan
OTP	✓	✓	✓	✓
MP	✓	✓	✓	✓
Xcel	✓	✓	✓	✓

A check mark (✓) indicates the required data were included in the utility's annual report filed April 2022.

The Department acknowledges OTP, MP, and Xcel's fulfillment of the requirements of Minnesota Rules, part 7826.1500.²⁴ Table 3 shows compliance with these expectations.

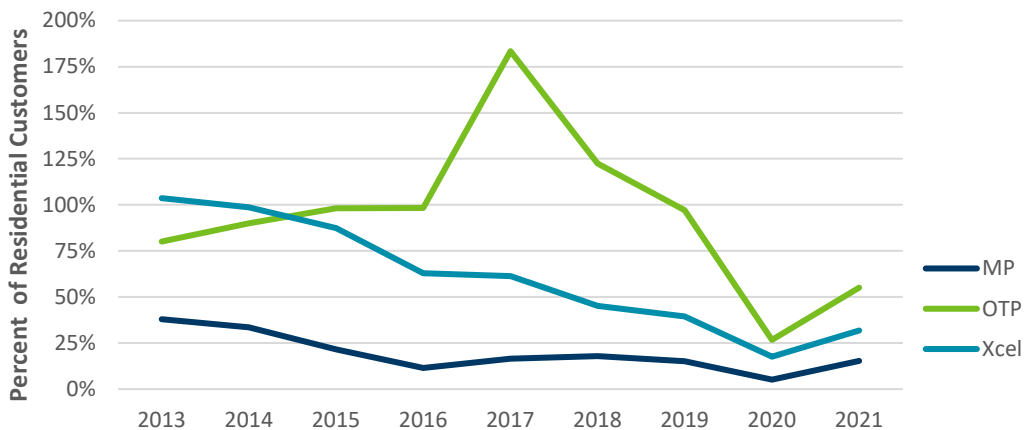
First, staff presents background information on the Commission and Utilities' responses to the COVID-19 Pandemic, to provide context for utility data. Beginning in April 2020, no residential customers were disconnected. Then, per Commission Order and reflected in utilities' Transition Plans, utilities were allowed to resume normal operating procedures such that on June 1, 2021 utilities resumed sending disconnection notices and on August 2, 2021 utilities resumed residential disconnections for nonpayment.²⁵

Next, staff discusses all utilities' performance together, rather than separating by utility as is done in other sections of this briefing paper.

²⁴ Comments, Department of Commerce, Docket No. E017/M-22-159 filed May 16, 2022, p18. Comments of the Minnesota Department of Commerce, Division of Energy Resources Docket No. E015/M-22-163, filed May 26, 2022, p15. Comments, Department of Commerce, Docket No. E002/M-22-162 filed June 2, 2022, p7.

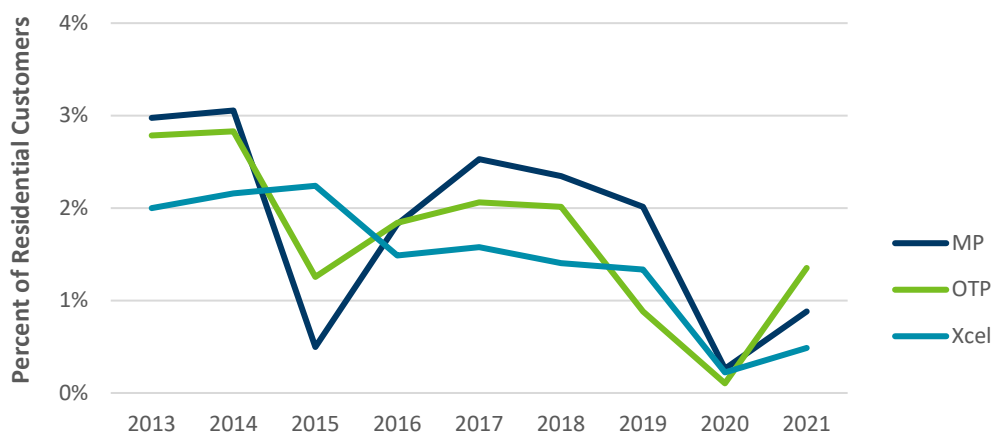
²⁵ ORDER ADOPTING BROAD TRANSITION PLAN PROPOSAL, SUSPENDING NEGATIVE REPORTING, AND ESTABLISHING NOTICE AND COMMUNICATION REQUIREMENTS, May 26, 2021 Docket No. E, G-999/CI-20-375

Figure 2. # Disconnection Notices Sent as a Percent of # Residential Customers



Staff Analysis. In Fig. 2, some years it appears as though every customer received a disconnect notice (unlikely) or that some customers receive multiple notices. Staff consulted with the Commission’s Consumer Affairs Office (CAO); it is common for utilities to send a disconnection notice and then work with the customer to become current on their bill by settling arrears or establishing a payment plan. However, despite becoming current at one point in time, that same customer may once again fall behind on their bill and receive another Notice. Therefore, while in Fig. 2 staff have shown notices sent in relation to total customers, to control for variation in number of customers, the same customer can receive more than one notice. This means that data collected by utilities, shown in Figs. 2 and 3, can only show how many notices were sent and how many customers were disconnected; data cannot explain how many unique customers were “warned” with a disconnection notice and then avoided disconnection.

Figure 3: Percent of Residential Customers Involuntarily Disconnected



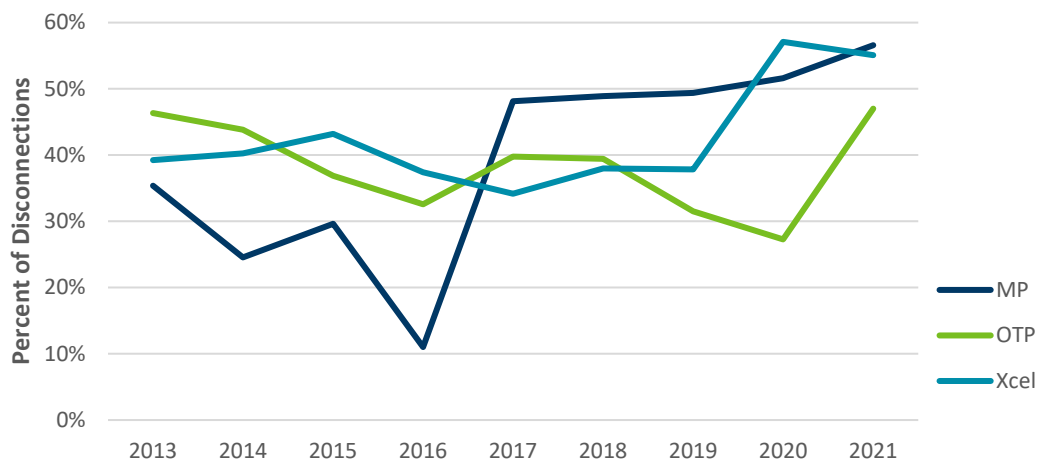
Staff Analysis. The three utilities show similar values for disconnections as a percent of total customers. Utilities only began sending notices and making disconnections in the second half of 2021 so it could be expected that data reported in these areas (Figures 2 and 3) would show values ~50% less than pre-pandemic values. Alternatively, some rebound in disconnects could be expected following the end of the moratorium on disconnections and with knowledge that while a similar number of customers were in arrears, customers were in more debt in August 2021 compared to previous years (Table 4). Growing arrears is a serious trend which staff will monitor. Further, Staff finds it concerning that the percent of residential customers disconnected by OTP in 2021 was greater than in 2019, considering that disconnections in 2021 were allowed to resume in August and that many disconnections would have been prohibited due to the Cold Weather Rules.²⁶ Arrears also grew more dramatically during the Pandemic for OTP than the other two utilities. Staff will continue to monitor this trend in 2022 data.

Table 4. # Past Due Residential Customers and Average Amount Past Due

	August 2019		August 2020		August 2021	
	# Customers	Average \$	# Customers	Average \$	# Customers	Average \$
OTP	15,522	\$45	7,695	\$298	6,812	\$271
MP	13,768	\$144	12,986	\$259	13,434	\$341
Xcel	170,549	\$234	163,581	\$389	168,450	\$487

To create this table only, staff included additional data from filings in docket nos. 19-02 and E/G999-CI-20-375.

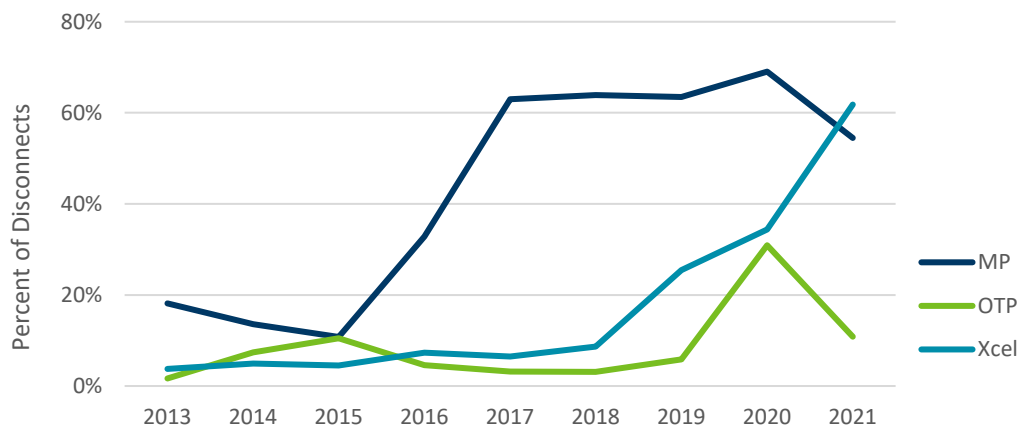
Figure 4: Percent of Disconnections Resored Within 24 Hours



Data from 2017-2021 show that all utilities had much higher percentages of customers restored in 24 hours in 2021 compared to previous years (Fig. 4). Importantly, as this measure is a percent, it would not be influenced by the limited number of months disconnections were undertaken in 2021, compared to pre-Pandemic years.

²⁶ MN Statute § 216B.096

Figure 5: Percent of Disconnections Restored on a Payment Plan



Staff Analysis. The percent of disconnects restored in 24 hours has represented to the Commission’s CAO a willingness on the part of the utility to work with its customers to make payment arrangements or find other means to pay past-due bills. Payment plan sign ups decreased in 2020; staff understands that without the “threat of disconnection” customers were able to shift priorities to needs more urgent than becoming current on utility bills. Staff would have expected the number of payment plans to increase in 2021 as utilities were actively working with customers to establish plans and more, that enrollment in a payment plan would provide additional protections.²⁷

Data from 2021 show that only Xcel had more payment plans in 2021 compared to previous years. The Commission may wish to inquire how Xcel was able to establish so many more payment plans in 2021, almost 50% more than in Xcel’s next highest year.

Staff does wish to note that on April 7, 2021 the Commission approved Xcel’s \$17.5million Payment Plan Credit program, in response to the COVID-19 Pandemic. Under the program residential electric customers with past-due balances between \$1,000 and \$4,000 would be eligible to receive 75% of their balance in bill credits over a term of up to 11 months if they entered a payment plan and continue to make monthly payments as arranged.²⁸ Xcel reported that through July 2022, \$15,418,421 was applied to customer accounts with another \$687,740 allocated for future payments. The Program account had \$1,393,839 remaining. At the end of July 2022, 1,581 customers were enrolled in the Program while 3,316 customers completed

²⁷ ORDER ADOPTING BROAD TRANSITION PLAN PROPOSAL, SUSPENDING NEGATIVE REPORTING, AND ESTABLISHING NOTICE AND COMMUNICATION REQUIREMENTS, DOCKET NO. E, G-999/CI-20-375, issued May 26, 2021. Para 2. “The Commission disallows the imposition of any service deposits, down payments, interest, late payment charges, or (business hour) reconnection fees through April 30, 2022, for customers who enter, or are complying with, a payment agreement. No fees or other charges shall be imposed on customers who are disconnected and reconnected after defaulting on one payment agreement and who agree to re-establish that agreement.”

²⁸ ORDER APPROVING PAYMENT PLAN CREDIT PROGRAM ISSUE DATE: April 7, 2021 DOCKET NO. E-002/M-20-760

their arrangement and received the full benefit allotted to them. A total of 11,641 customers were disqualified, most often after missing two consecutive payments.²⁹

The percent of customers restored in 24 hours and percent restored with a payment plan, always total *more* than the number of customers disconnected for MP and do so in 2021 for Xcel. This may represent different tracks possible for customers to restore their electrical service. In this way, it is important to consider both methods of returning customers to service as a more complete picture of residential customer status. The Commission may wish to inquire about utilities' use of payment plans and threshold to restore service in 24 hours and more, ask MP to comment on the role of its Remote Reconnect pilot and 3,371 participants.

Finally, while OTP had high percentages of customers restored in either 24 hours or with a payment plan in both 2020 and 2021, compared to previous years, a larger percent of customers were restored in 24 hours in 2021, compared to 2020 while the opposite pattern was true for payment plans. The Commission may also wish to inquire about this switch.

Department Concerns with Xcel. The Department compiled three years of historic data and observed that in 2021, compared to 2020, there were increases in the number of customers receiving disconnection notices, disconnected involuntarily, and entering into a payment plan which, "increased significantly."³⁰

Cold Weather Rule

OTP The percentage of OTP CWR grantees (292 granted / 360 requests) is lower than other utilities but is not the result of denial of protection. Instead, OTP explained it has discussions with the customer and the customer choose an "alternative payment option."³¹ Elaboration on alternative payment options was not provided.

Department Concerns. The Department commented that the increases in number of OTP customers seeking CWR protections and the number of customers disconnected in 2021 were, "concerning," though the Department acknowledged that broadly, since 2012, the number of customers reported in each category had been declining.³²

MP granted 100% of requests from customers seeking CWR protection. However, the total number of customers seeking protection was much lower than in 2020 and 2019, despite the moratorium on disconnection in 2020.

Xcel granted 100% of the 80,143 requests from customers seeking CWR protection. The number of customers granted protection is similar to 2019 but relatively less than 2009-2018, in which over 105,000 customers to nearly 280,000 customers were granted protection.

²⁹ Xcel 15-MONTH STATUS REPORT Payment Plan Credit Proposal Docket No. E002/M-20-760, August 12, 2022.

³⁰ Comments, Department of Commerce, Docket No. E002/M-22-162 filed June 2, 2022, p7.

³¹ OTP initial filing made April 1, 2022, p46.

³² Comments, Department of Commerce, Docket No. E017/M-22-159 filed May 16, 2022, p17.

C. 7826.1600 Service Extension Request Response Times

Table 5. Reporting Required by MN Rule 7826.1600

	# Requests to locations NOT previously served and time until ready for service	# Requests to locations previously served and time until ready for service
OTP	✓	✓
MP	✓	✓
Xcel	✓	✓

A check mark (✓) indicates the required data were included in the utility's annual report filed April 2022.

The Department acknowledged that OTP, MP, and Xcel fulfilled the requirements of Minnesota Rules, part 7826.1600.³³ Table 5 shows compliance with these expectations.

OTP Reporting System

In response to the 2019 annual report, OTP was ordered to include a detailed description of the resolution to the reporting problems attributed to their updated Customer Information System (CIS) pertaining to response times.³⁴ OTP remedied the problem, in which their CIS began counting response duration at the time of initial inquiry, not necessarily when the customer was ready to have service installed; the remedy modified the system to differentiate between inquiries and customers ready for installations.³⁵ However, for a small number of customers in 2021 OTP noted, "that new location service orders are being sent when the location is not ready for service."³⁶ A team continues to review OTP's CIS to identify process improvements.

OTP previously served locations Between 2013 and 2018, OTP had fulfilled most service requests on the date requested. However, in 2019 OTP received a much larger volume of requests than in other years. While over 5,600 requests were completed on the date requested, over 2,200 requests took 1-10 days beyond the service date requested. In 2020 and 2021, the number of requests returned to near 2013-2018 levels; however, for both 2020 and 2021 late responses to service requests were much more common than in 2013-2018 (Table 6).

Table 6. OTP Service Extension times for locations previously served

Year	# Requests, residential and commercial	On date requested	1-10 days later	11+ days later
2013	2,192	99%	<1%	<1%
2014	2,166	100%	0%	0%
2015	2,004	100%	0%	0%
2016	1,993	99%	1%	0%
2017	1,873	99%	0%	0%
2018	1,878	99%	1%	0%

³³ Comments, Department of Commerce, Docket No. E017/M-22-159 filed May 16, 2022, p18. Comments, Department of Commerce, Docket No. E015/M-22-163 filed May 26, 2022, p16. Comments, Department of Commerce, Docket No. E002/M-22-162 filed June 2, 2022, p9.

³⁴ Order issued December 18, 2020 Docket Nos. E-017/ M-20-401; E-015/ M-20-404; E-002/ M-20-406, para 15.

³⁵ OTP Compliance Filing in Docket No. E-017/ M-20-401, p 2-3. Filed January 18, 2021.

³⁶ OTP initial filing made April 1, 2022, p59.

2019	7,898	72%	28%	0%
2020	1,344	69%	31%	0%
2021	1,357	68%	31%	1%

Results rounded to the nearest whole percent.

OTP not previously served locations The number of days needed to complete service to locations **not** previously served increased. Specifically, the proportion of new locations served on the date requested dropped to 23.8% in 2021, from 35% in 2020. The proportion completed 1-10 days later than requested has decreased to 51% compared 65% in 2020. Instances where services to new locations was 11+ days late has been increasing over the past several years, with a dramatic increase in the proportion of extension requests completed 11+ days late from <1% in 2020 (1 request 11+ days late) to 24.9% in 2021 (115 requests; Table 7).

Table 7. OTP Service Extension times for locations not previously served

Year	# Requests, residential and commercial	On date requested	1-10 days later	11+ days later
2019	261	25%	56%	19%
2020	536	35%	65%	0%
2021	462	24%	51%	25%

Results rounded to the nearest whole percent.

Department Comment. The Department recognized that in comparison to 2020, “the number of extension requests for locations not previously served declined by approximately 15 percent while the number of requests for previously served locations was constant. According to the Company, its new location process and software are identifying many locations with high numbers of days to complete. Otter Tail is working to resolve that issue.”³⁷

MP Reporting System

MP’s service extension response times were reported to have been lengthened by supply chain shortages. However, improving from previous years, MP’s Customer Information System (CIS) was reconfigured and aligned with MP’s work management system for better performance. Previously, CIS had shown delays in service due to artificial inflation of response times, as the “clock” started when a service inquiry was filed, often much earlier than when the customer was ready for service. A similar issue was reported by OTP.

MP previously served locations In 2021, all commercial locations previously serviced by MP were connected to service on the date requested; residential locations were also largely serviced on the date requested (250 / 260 total requests, 96%) or the next business for Friday requests (four of the 10 late responses). One residential customer’s service was delayed for 21+ days and one customer was delayed due to MP’s workload.

³⁷ Comments, Department of Commerce, Docket No. E017/M-22-159 filed May 16, 2022, p18.

Department Concern. “The Department is perplexed by the significant decrease in the number of previously served customer service requests for 2021 and asks the Company to explain the drivers for this large decrease in its reply comments.”³⁸

MP Reply. The Company explained it, “began using a new Customer Information System in April of 2020. At that time, internal processes were adjusted by means of what is counted as a customer service request. Prior to this system and process update, items in the customer service request count were duplicates, as the system would inadvertently double count previously served customer requests if the customer had more than one service agreement with the Company.”³⁹

MP not previously served locations In 2021 MP received 1,432 service requests for new residential and commercial customers. Each class saw a greater percentage of projects completed on the date requested compared to prior years (Table 8).

Table 8. MP Service Extension times for locations not previously served

	YEAR	# REQUESTS	ON DATE REQUESTED	1-10 DAYS LATER	11+ DAYS LATER
RESIDENTIAL	2019	787	43%	25%	32%
	2020	929	54%	30%	16%
	2021	1050	81%	13%	6%
COMMERCIAL	2019	723	25%	37%	38%
	2020	711	54%	20%	26%
	2021	382	79%	12%	9%

RESULTS ROUNDED TO THE NEAREST WHOLE PERCENT.

In 2021, for locations not previously served, for all customer classes (commercial, residential, industrial, and municipal), MP was late to complete 292 requests. Lateness was explained as: dates were not updated (46.58%), the customer was not ready (19.86%), and MP was unable to meet the date (13.7%).⁴⁰ The same reasons were cited for delays in 2020; in 2019 weather caused delays rather than MP not being ready.⁴¹

Staff Analysis. Though the *reason* for late installs has remained consistent, the percent and number of delayed installs decreased. This supports MP’s contention that while issues with their CIS improved, supply chain issues introduced additional challenges.

Department Comment. The Department also acknowledged MP’s fulfillment as well as noted with respect to locations **not** previously served, “2021 results for this metric overall

³⁸ Comments, Department of Commerce, Docket No. E015/M-22-163 filed May 26, 2022, p16.

³⁹ Reply Comments, MP, Docket No. E015/M-22-163 filed June 15, 2022, p4.

⁴⁰ MP initial filing April 1, 2022 Docket No. E015/M-22-163, p76

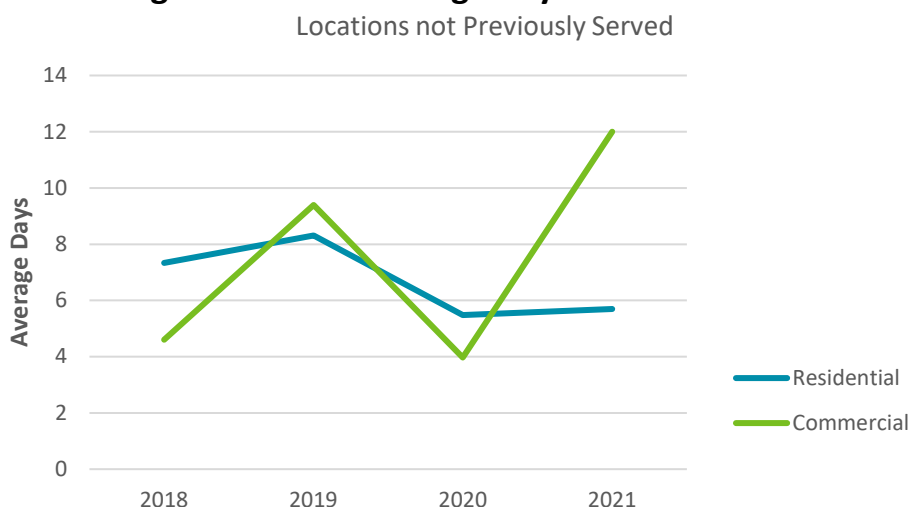
⁴¹ MP, initial filing, Docket no. 21-230 filed April 1, 2021, Appendix A p40. MP, initial filing into Docket 20-404 filed April 1, 2020, Appendix A p31.

improved significantly from 2020 (80% versus 54% completed on time). The Department appreciates MP's efforts in this regard."⁴²

Xcel previously served locations Xcel reported 212,410 (80,000 fewer requests than in 2020); like all years prior, requests were handled on the next business day.

Xcel not previously served locations Xcel reported similar numbers of residential requests but fewer commercial requests (218 requests in 2021 compared to 603 in 2020) for service to locations **not** previously served. However, the average number of days needed to complete the work was much higher for commercial customers compared to previous years, Figure 6.

Figure 6: Xcel's Average Days to Extend Service



Staff Analysis. Xcel is now in their fourth year of the SAP system, initiated in 2018. In 2021 the Company's consistent, decreased response times as well as no mention of SAP-related difficulties demonstrate to Staff a command of their SAP process. In 2021 the Company explained that delays in service to commercial customers was the result of supply chain issues, weather, complexity, and job site readiness,⁴³ contrary to previous years in which Xcel's SAP system was the source of delays. Indeed, in response to the 2019 annual report, Xcel was ordered to include a detailed description of the resolution to the reporting problems attributed to their updated SAP work management system pertaining to response times.⁴⁴ In 2019 values for time to complete service were quite high due to the system "starting the clock" as soon as a new project was put into the system, rather than reflecting the actual start date of installation.⁴⁵ As noted above, a similar issues was reported by OTP and MP.

⁴² Comments, Department of Commerce, Docket No. E015/M-22-163 filed May 26, 2022, p16.

⁴³ Xcel initial filing Part 1 made April 1, 2022 docket no E002/M-22-162, p8. Xcel explanations given as to why service installations to new locations were delayed in 2021.

⁴⁴ Order issued December 18, 2020 Docket Nos. E-017/ M-20-401; E-015/ M-20-404; E-002/ M-20-406, para 15.

⁴⁵ Xcel Compliance Filing in docket no. E002/M-20-406, p 2-3. Filed January 19, 2021.

Department Comment. The Department discussed service to locations **not** previously served and acknowledged that response time for residential customers, was “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.”⁴⁶ The Department acknowledged Xcel’s work to improve performance with its SAP system but did request an explanation for increased commercial class installation times.

Xcel Reply. Xcel explained that Permitting, Customer Delays, Supply Chain Issues, and Design Resource Issues were the drivers behind longer commercial extension times.⁴⁷

Staff Analysis. The average time to extend service to new commercial customers increased from 4 days in 2020 to 12 days in 2021. However, this may be the result of a smaller number of new commercial customers being connected in 2021 (218 requests in 2021 compared to 603 in 2020). A smaller number of new commercial customers results in an average that is more easily affected by outliers. The previous spike in the average days required to extend service to commercial customers occurred in 2019, a year which also saw a smaller number of new commercial customers (187 customers in 2019).

D. 7826.1700 Call Center Response Times

Table 9. Reporting Required by MN Rule 7826.1700

	# Calls to business office, month-by-month breakdown	# Calls regarding service interruptions, month-by-month breakdown	# Total Calls Offered to Agents and answered within 20 Seconds
OTP	No.	No.	✓
MP	All calls directed to agents unless re: interruptions	Sent through IVR	✓
Xcel	✓	✓	✓

A check mark (✓) indicates the required data were included in the utility’s annual report filed April 2022.

The Department did not comment on the lack of distinction regarding calls received by the business office and those regarding service interruptions; instead, the Department concluded that OTP complied with MN Rules part 7826.1200.⁴⁸ The Department reported MP and Xcel complied with requirements of MN Rules.⁴⁹ Table 9 shows compliance with these expectations.

MN Rules set a utility performance standard in which annually, 80% of calls made during business hours must be answered within 20 seconds. Calls made regarding service interruptions

⁴⁶ Comments, Department of Commerce, Docket No. E002/M-22-162 filed June 2, 2022, p9.

⁴⁷ Xcel reply comments Docket No. E002/M-22-162 filed June 24, 2022, p4-5.

⁴⁸ Comments, Department of Commerce, Docket No. E017/M-22-159 filed May 16, 2022, p18.

⁴⁹ Comments, Department of Commerce, Docket No. E015/M-22-163 filed May 26, 2022, p17. Comments, Department of Commerce, Docket No. E002/M-22-162 filed June 2, 2022, p10.

may be “answered” by connecting the customer to a recording that provides specified information. For calls to the business office using an automated call processing-system, like IVR, the 20 second countdown clock begins when the customer has selected a menu option to speak to a live operator or representative.⁵⁰

OTP In 2021, OTP exceeded the requirement in MN rules by answering 90.3% of calls within 20 seconds.⁵¹ However, in 2019, fewer calls were answered within 20 seconds, compared to previous years. This decrease may have been a product of OTP’s switch to a new CIS which, also impacted service extension response times. Perhaps showing familiarity with the new system, in 2020, calls answered within 20 seconds exceeded the 80% requirement, despite employees’ shift to working from home.⁵² Percent of calls answered remained high in 2021.

In 2021, 527 calls were abandoned (compared to 192 calls in 2020). As other utilities do not report this metric Staff does not have a means for comparison but does note the increase in abandoned calls from 2020 to 2021, despite the call center receiving a similar volume of calls in both years.⁵³ This would suggest employees were met with similar call volumes but for some reason, more calls were abandoned in 2021; however, staff is unaware of yearly staffing levels. Note, in 2019 the number of customers electing to abandon⁵⁴ calls had increased (1,682 calls).⁵⁵ In response to Staff’s IR, OTP discussed the transition to its new CIS and acknowledged that employees were gaining familiarity with the system which led to longer customer wait times.⁵⁶

MP answered 50% of calls offered during business hours within 20 seconds, well below the performance target of 80% set in MN Rules. MP attributed their performance to higher call volumes and decreased staffing. Calls answered within 20 seconds *outside* business hours was 49%, a decrease compared to the 51% of calls answered in 2020 and 68% in 2019 (Fig. 7 and Table 10). MP explained that they continue to onboard new staff and while response times remain longer than the 20 second performance standard in 2022, the Company hopes response time will improve as new employees receive more training and experience.

⁵⁰ MN Administrative Rules 7826.1200 Call Center Response Time, Subparts 1 and 2.

⁵¹ OTP amended filing docket no. E017/M-21-225 September 26, 2022

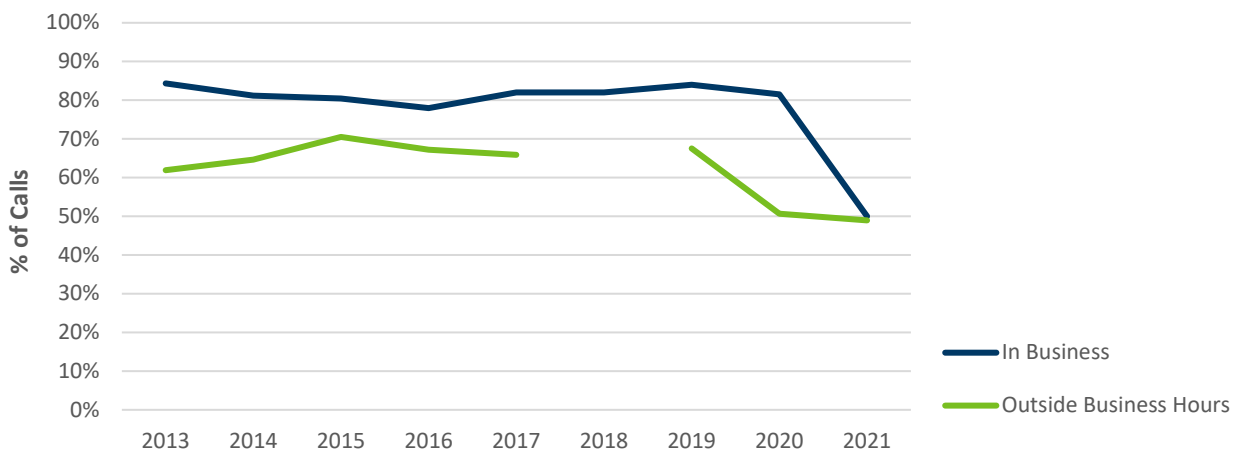
⁵² Otter Tail Power initial filing SRSQ annual report docket no. E017/M-21-225 filed April 1, 2021, p54.

⁵³ OTP received 55,180 total calls in 2020 and 53,747 total calls in 2021

⁵⁴ For OTP, subtracting calls offered from totals calls results in the number of abandoned calls.

⁵⁵ Otter Tail Power initial filing SRSQ annual report docket no. E017/M-20-401 filed April 1, 2020, p56.

⁵⁶ Response to MN PUC filed by OTP on September 30, 2020 docket no. E017/M-20-401

Figure 7: Percent of MP Calls answered within 20 seconds

MP did not provide a value for the percent of calls offered outside of business hours in 2018

Prior to 2020, MP reported the % of All Calls Answered but has since switched to the % of All Calls Offered

Department Concern. “While MP’s 2021 call center response results are not even close to reasonable, the Department notes staff shortages are occurring throughout Minnesota’s economy and apparently Minnesota Power is not an exception. The Department recommends monitoring this situation for the next couple of years to see if the Company can respond successfully to this new post-pandemic environment. The Department also requests the Company provide an update on its efforts to restore its call center capabilities in its reply comments.”⁵⁷

MP Reply. MP explained that it has hired additional call center staff but is still looking to fill open positions. More, part of the onboarding process includes mentorship from existing employees, which slows down their own call processing abilities.⁵⁸

Staff Analysis. At the agenda meeting, MP may wish to update the Commission as to if MP remains short staffed or if MP is fully staffed but are in the process of training new staff.

⁵⁷ Comments, Department of Commerce, Docket No. E015/M-22-163 filed May 26, 2022, p17.

⁵⁸ Reply Comments, MP, Docket No. E015/M-22-163 filed June 15, 2022, p4-5.

Table 10. MP Monthly Performance during Business Hours 2021⁵⁹

Business Hours 7:00 a.m. - 5:30 p.m.			
Month 2021	Response Time	Total Calls Offered	Calls Answered within 20 seconds
JAN	84%	7,355	6,174
FEB	75%	8,814	6,611
MAR	78%	9,420	7,342
APR	81%	8,746	7,121
MAY	65%	9,806	6,398
JUN	56%	11,035	6,154
JUL	41%	11,431	4,664
AUG	32%	12,643	4,021
SEP	15%	12,972	1,963
OCT	17%	11,301	1,957
NOV	46%	10,306	4,740
DEC	48%	9,190	4,373
YTD	50%	123,019	61,518

Staff also notes that performance in call centers began to decline below performance targets (highlighted in yellow, Table 10) in May 2021, when transition plans introducing return to normal operations were filed. Disconnections began in August and Cold Weather Rule (CWR) period began in October (though MP received only 1,078 CWR calls). These events may have led to many customer calls and may have overwhelmed MP's already short-staffed call center.

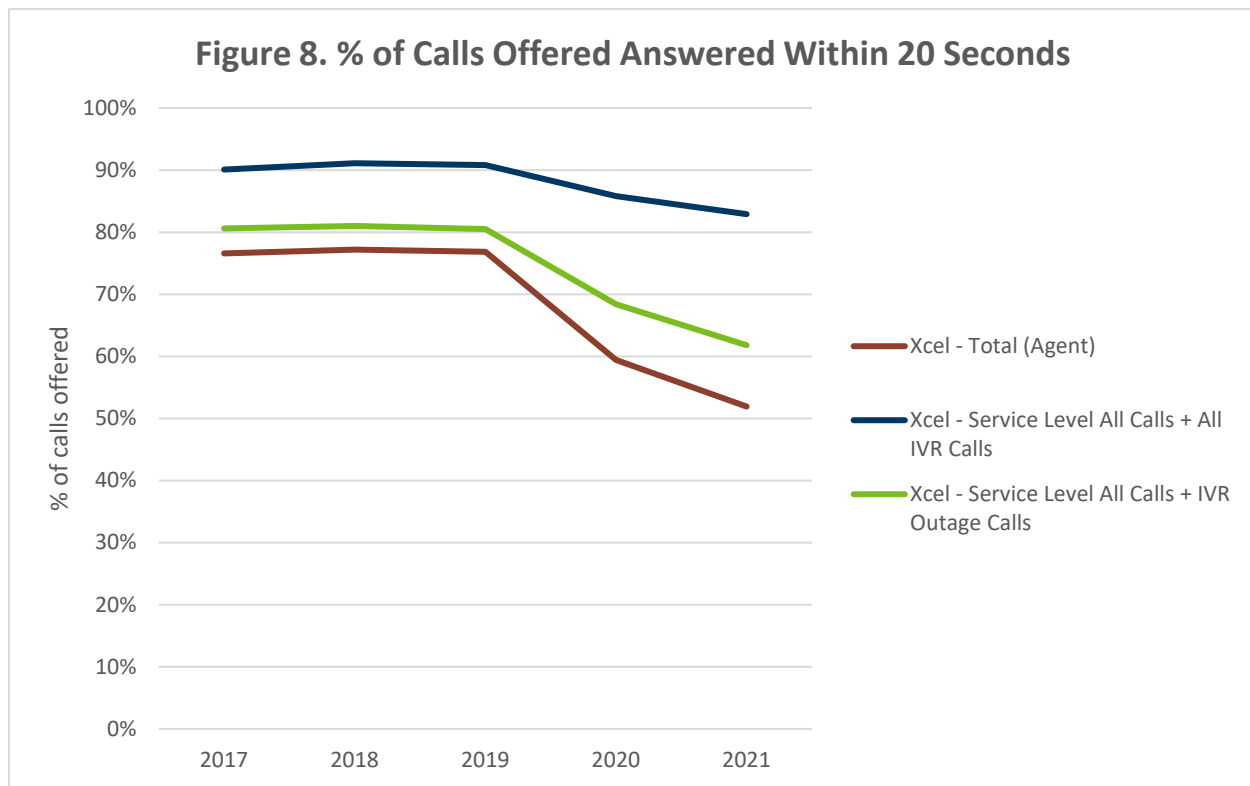
Staff mentioned in section 7826.1500 that in 2021 a higher percentage of MP's disconnected customers were restored to service within 24 hours. This could reflect call center performance such that while only 50% of calls were answered within 20 seconds and staffing levels were down, service agents may still have been able to help customers, just doing so following a longer wait time.

Xcel The Company's errata filing indicated an omission of data (errantly coded as Colorado) in September – December 2021. However, the errata filing did not include an updated "Line 20" or "Line 21"⁶⁰ which are how Xcel has historically reported its call center data. Together, Lines 20 and 21 show the difference when IVR responses to *all calls* are included in call center response time versus only including IVR responses to calls concerning outages.

Absence corrections to Lines 20 and 21, staff reports that 992,533 total calls were offered to agents and of those, 516,035 (52%) were answered in 20 seconds. A total of 257,779 outage calls were answered by IVR and 150,300 outage calls were answered by agents (see Fig. 8).

⁵⁹ MP initial filing April 1, 2022 p82

⁶⁰ "Line 20" (Service Level All Calls- Calls (Residential, BSC (business solutions center), Credit, PAR (personal account representatives), and all calls handled by IVR); "Line 21" (Residential, BSC (business solutions center), Credit, PAR (personal account representatives), and only outage calls handled by IVR)."



In 2019 staff began to inquire about Xcel’s use of interactive voice response (IVR) in reporting for calls answered within 20-second threshold.⁶¹ In its 2021 filing Xcel reiterated its stance on inclusion of IVR,

As required by Minn. Rule 7826.1700, the Company reports “call center response times, including calls to the business office and calls regarding service interruptions” as a combined metric. As authorized under Minn. Rule 7826.1200, Subp. 2, for service interruptions, the metric includes outage calls made to the business office and outage calls handled by the IVR system. Additionally, many customers prefer the IVR system, so we make it a priority to ensure IVR is easy to use. By not including these calls, customers are not given consideration for their preferred channel in the metric. Although the reporting on call center response times has evolved organically over time and new lines have been added to Attachment F for transparency, we have used this same approach for reporting for more than 15 years, since Rules 7826.1200 and 7826.1700 became effective. Removing the ability to include IVR handled outage calls in our metric would require a significant increase to the Customer Care operations budget.⁶²

In response to the 2020 annual report, Xcel was required to provide additional information on progress made hiring new call center representatives in 2021 and the effects of those new employees on its agent only metrics.⁶³ Xcel reported that in 2021 COVID impacted call center

⁶¹ Order issued December 18, 2020 Docket Nos. E-017/ M-20-401; E-015/ M-20-404; E-002/ M-20-406, para 13.

⁶² Xcel initial filing Part 1 made April 1, 2022 docket no E002/M-22-162, p11.

⁶³ Order issued December 2, 2021 Docket Nos. E-015/ M-21-230; E-017/ M-21-225; E-002/ M-21-237, para 5.

employee retention, experiencing a 66% attrition rate. During 2021 Xcel struggled with COVID illness, working from home, and training new staff, all negatively impacting call response times. In response, Xcel maintained a flexible work environment and raised wages by 20%. Note, at the time of filing the call center was 99% staffed.

Department Comment. The Department commented on Xcel’s “lengthy explanation” on its call center staff and gave positive feedback regarding efforts to transition to remote work and noted the Company is attempting remedies to attrition and absenteeism. The Department mentioned IVR as well, stating that Xcel assumes all IVR calls are answered in 20 seconds, including calls made during business hours and outage calls, acknowledged as two separate measures. The Department then discussed outage calls further, “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.”⁶⁴

Staff Analysis on IVR. MN Rule 7826.1200 specifies that “[f]or calls to the business office using an automated call processing-system, like IVR, the 20 second countdown clock begins when the customer has selected a menu option to speak to a live operator or representative.”⁶⁵ Staff believes it is not appropriate for Xcel to present calls answered by IVR in its call center response time. Regardless of the inclusion of IVR in call center metrics, there has been a decline in performance which the Commission may wish Xcel to provide an update (Fig. 8).

E. 7826.1800 Emergency Medical Account Status (EMS)

Table 11. Reporting Required by MN Rule 7826.1800

	# Customers requesting EMS	# Customers granted EMS	# EMS Denials and Explanation
OTP	✓	✓	✓
MP	✓	✓	✓
Xcel	✓	✓	✓

A check mark (✓) indicates the required data were included in the utility’s annual report filed April 2022.

The Department acknowledged OTP, MP, and Xcel’s fulfillment of the requirements of Minnesota Rules, part 7826.1800.⁶⁶ Table 11 shows compliance with these expectations.

Following filing of 2019 data, utilities were ordered to file explanatory narratives on customer engagement plans regarding Emergency Medical Account status (EMS).⁶⁷ All three Companies

⁶⁴ Comments, Department of Commerce, Docket No. E002/M-22-162 filed June 2, 2022, p9.

⁶⁵ MN Administrative Rules 7826.1200 Call Center Response Time, Subparts 1 and 2.

⁶⁶ Comments, Department of Commerce, Docket No. E017/M-22-159 filed May 16, 2022, p19. Comments, Department of Commerce, Docket No. E015/M-22-163 filed May 26, 2022, p18. Comments, Department of Commerce, Docket No. E002/M-22-162 filed June 2, 2022, p11.

⁶⁷ Order issued December 18, 2020 Docket Nos. E-017/ M-20-401; E-015/ M-20-404; E-002/ M-20-406, para 15.

filed compliance filings in their respective 2019 SRSQ dockets in January 2021⁶⁸ including working with each other and community organizations to expand outreach efforts.

OTP In 2021, like 2020, six Minnesota customers requested and were granted EMS.

MP 73 of MP's customers requested and were granted EMS. A total of 203 customers in MP's system are designated medical accounts. No customers were removed from EMS protection in 2021, a decision made by the Company acknowledging customer difficulties connecting with medical professionals to obtain documentation affirming the need for medical status.

Xcel sent postcards and pre-printed application cards to customers for EMS as well as reached out to qualifying customers and training call center staff. Xcel received 1,084 requests for EMS and denied 113 requests, citing incomplete forms or doctor refusal. Staff notes that despite outreach efforts, fewer customers requested EMS than during any time 2008-2019.

Department Comment. The Department noted that in 2021 more of Xcel's customers requested EMS compared to 2020 but slightly fewer were granted status. The Department's analysis aligned with staff's conclusion that Xcel's EMS numbers were significantly lower in 2021 compared to Xcel's 10-year average despite outreach efforts.⁶⁹

F. 7826.1900 Customer Deposits

Table 12. Reporting Required by MN Rule 7826.1800

	# Customers required to make a deposit as a condition of receiving service
OTP	✓
MP	✓
Xcel	✓

A check mark (✓) indicates the required data were included in the utility's annual report filed April 2022.

The Department acknowledged OTP, MP, and Xcel's fulfillment of the requirements of Minnesota Rules, part 7826.1900.⁷⁰ Table 12 shows compliance with these expectations.

MP refunded all deposits in 2014 and may reconsider collecting deposits. Staff is curious as to what might trigger this change in the operating procedures in place since 2014.

OTP No deposits were requested as a condition of receiving service in 2021. OTP explained this as part of the suspension of collection activities during the COVID-19 Pandemic,⁷¹ though staff

⁶⁸ MP provided information in a January 18, 2021 Compliance Filing in Docket No. E015/M-20-404, p 2-3. Xcel provided information in a January 19, 2021 Compliance Filing in Docket No. E002/M-20-406, p2. OTP provided information in a January 18, 2021 Compliance Filing in Docket No. E017/M-20-401, p 1-2.

⁶⁹ Comments, Department of Commerce, Docket No. E002/M-22-162 filed June 2, 2022, p10.

⁷⁰ Comments, Department of Commerce, Docket No. E017/M-22-159 filed May 16, 2022, p20. Comments, Department of Commerce, Docket No. E015/M-22-163 filed May 26, 2022, p18. Comments, Department of Commerce, Docket No. E002/M-22-162 filed June 2, 2022, p11.

⁷¹ OTP initial filing made April 1, 2022 into Docket No. E-017/ M-22-159, p63.

notes that normal disconnection procedures resumed in August 2021. In 2020 OTP collected 297 deposits as a condition of a customer being returned to service, fewer deposits than were required pre-Pandemic, in 2019 (652 deposits).⁷²

Xcel requested, “583 deposits as a condition of service for our residential customers that had filed for bankruptcy. We request these deposits upon notification from the bankruptcy court and/or the customer of their bankruptcy petition.”⁷³ Xcel requested 678 deposits in 2020 and 486 deposits in 2019.

Department Comment. The Department shared its historic analysis and concluded that in 2021, the number of deposits requested by Xcel was 11% greater than the 10-year average.⁷⁴ Xcel did not comment on this remark in its June 24, 2022 Reply Comments.

G. 7826.2000- Customer Complaints

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

Table 13. Reporting Required by MN Rule 7826.2000

	# Complaints received	#, % Complaints alleging billing errors, inaccurate metering, wrongful disconnection, high bills, inadequate service, service-extension or restoration intervals, and any other issue involved in ≥5% of complaints	Method and Timing of Resolution	Complaints forwarded to the Utility by the CAO for further action
OTP	✓	✓ - but did not include service extension/restoration ⁷⁵	✓	✓
MP	✓	✓ - but did not include service extension	✓	✓
Xcel	✓	✓	✓	✓

A check mark (✓) indicates the required data were included in the utility’s annual report filed April 2022.

The Department acknowledges OTP, MP, and Xcel’s fulfillment of the requirements of Minnesota Rules, part 7826.2000.⁷⁶ Table 13 shows compliance with these expectations.

Complaints Reported

⁷² OTP initial filing made April 1, 2021 into Docket No. E-017/ M-21-225, p57.

⁷³ Xcel initial filing Part 1 filed April 1, 2022 into Docket No. E002/M-22-162, p13.

⁷⁴ Comments, Department of Commerce, Docket No. E002/M-22-162 filed June 2, 2022, p11.

⁷⁵ Comments, Department of Commerce, Docket No. E017/M-22-159 filed May 16, 2022, p20; however, stated that, “OTP’s report on customer complaints includes the required information.”

⁷⁶ Comments, Department of Commerce, Docket No. E017/M-22-159 filed May 16, 2022, p21. Comments, Department of Commerce, Docket No. E015/M-22-163 filed May 26, 2022, p19. Comments, Department of Commerce, Docket No. E002/M-22-162 filed June 2, 2022, p13.

Table 14. Complaints

Utility	Year	Total Complaints	% Resolved Immediately	Most Common Complaint	2 nd Most Common Complaint
OTP	2019	28	54	Other (68%)	High Bill (18%)
	2020	30	80	Other (63%)	High Bill (30%)
	2021	113	94	Bill Error (58%)	Other (31%)
MP	2019	525	60	High Bill (70%)	Inaccurate Meter Read (19%)
	2020	545	52	High Bill (79%)	Inaccurate Meter Read (11%)
	2021	513	30	High Bill (81%)	Inaccurate Meter Read (9%)
Xcel	2019	756	14	Inadequate Service (60%)	Wrongful Disconnection (17%)
	2020	430	14	Inadequate Service (57%)	Bill Error (16%)
	2021	484	11	Inadequate Service (57%)	Bill Error (17%)

Parenthesis display the % of total complaints for a specified reporting year

OTP reported more complaints in 2021 (113 total) than in any year since 2013. However, 106 of those complaints were resolved immediately. In 2021 OTP resolved most complaints by compromising with the customer. Billing error was listed as the reason for 66 (58%) complaints in 2021 (see Table 14); there have not been no billing error complaints made to OTP since 2017. The Commission may wish to follow up on billing errors.

Department concern. Rapid complaint resolution notwithstanding, the Department requested an explanation as to why so many more complaints were received in 2021 compared to previous years.⁷⁷

OTP Reply. In replies, OTP explained a recent training for employees on identifying when a matter should be considered a complaint as well as enhancements to its CIS represent a change in how communications are categorized, rather than a change in customer satisfaction.⁷⁸ In their letter, the Department stated it was satisfied with OTP's response.⁷⁹

MP reported a total of 513 complaints (469 residential and 44 commercial). Most complaints were resolved on the same day (30%) or in less than 10 days (26%). However, the number of complaints resolved in 10 days and 10+ days both increased in 2021 by 19% **and 100%**

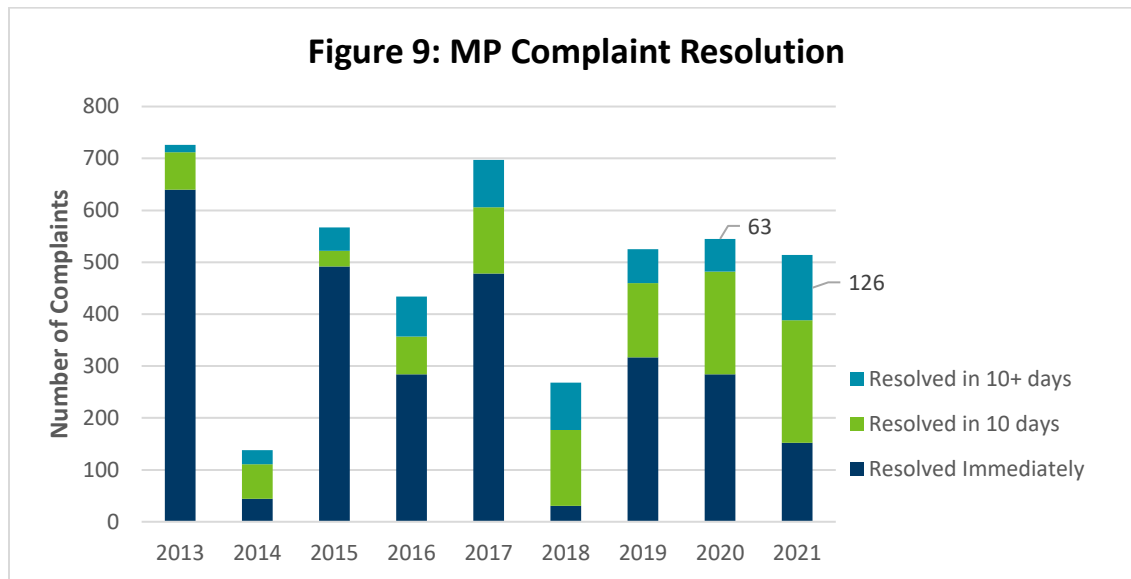
⁷⁷ Comments, Department of Commerce, Docket No. E017/M-22-159 filed May 16, 2022, p21.

⁷⁸ Replies, OTP, Docket No. E017/M-22-159 filed May 26, 2022, p2.

⁷⁹ Letter Recommending Approval of 2021 Annual Service Quality Report, Department of Commerce, September 20, 2022, Docket No. E017/M-22-159

respectively. Thus, in 2021 MP reported its largest number of complaints (126 complaints) taking 10+ days to be resolved since 2013 (see Fig. 9).⁸⁰

Compared to previous years fewer complaints in 2021 were resolved on the same day (~30%). In 2020, for a total of 545 complaints, most were resolved on the same day (52%) or less than 10 days (36%). In 2019, for a total of 525 complaints, most were resolved on the same day (60%) or less than 10 days (27%). In 2021, MP most often determined the complaint was not under utility control.



Staff Analysis. Performance in 2021 could perhaps be attributed to call center staffing shortages or complexity of customer questions, given the transition back to normal utility operating procedures beginning May 2021. MP may wish to give clarity on this matter.

Xcel reported a total of 484 complaints (445 residential, 37 commercial, and 2 industrial). Most complaints were resolved in 10 days or less (86.4%) and few were resolved immediately (10.7%) or in greater than 10 days (2.9%). In 2020, 430 complaints were received and the pattern for resolution followed the same pattern reported for 2021. For Xcel, resolution occurred most often by compromising, followed closely by taking the action the customer requested.

Work Group

In 2019, Staff noticed that high percentages of complaints were categorized under seemingly ambiguous titles like “Other” and “Inadequate Service.” In response, all three electric IOUs were ordered to file revised categories for reporting customer complaint data, following consultation with Department and Commission staff.⁸¹ The group, including representatives from utilities, the Commission’s CAO, and the Department, met four times and ultimately

⁸⁰ However, 2018 marked the greatest percentage of complaints taking more than 10 days to be resolved (91 out of 630 total complaints, 14.4%).

⁸¹ Order issued December 18, 2020 Docket Nos. E-017/ M-20-401; E-015/ M-20-404; E-002/ M-20-406, para 16

created a shared set of complaint sub-categories which add specificity and consistency to complaint reporting per Minnesota Rule 7826.2000. At its last meeting, in March 2022, the group agreed to continue to assess “fit” of new sub-categories, including those for “inadequate service” and to create a shared glossary to define the new sub-categories.

For further detail on this final meeting MP explained, “[i]n the March 2022 meeting, the utilities each brought further details regarding the practical application of complaint categories their respective organizations used. These were discussed in detail to find consensus categories and application, where possible, for reporting in annual service quality reports, including category definitions and timing for any changes determined as part of the work group process. Ultimately, parties agreed to additional detail for reporting of the category “Inadequate Service”, as listed in Minnesota Rule 7826.2000. Inadequate Service is a broad topic and separating this category further will assist in the overall depiction of the types of complaints reported. Utilities will break out Inadequate Service into:

- Inadequate Service – Field/Operations
- Inadequate Service – Customer Service
- Inadequate Service – Programs and Services
- Inadequate Service – Cold Weather Rule Protection

Parties in the work group generally agreed that, beginning with the 2023 SRSQ Annual Report, filed in April of 2024, the utilities would report on the customer complaint categories agreed to by consensus. Beginning with those SRSQ reports, the utilities will include a table of the agreed upon complaint categories, definitions of what falls into those categories, and count of complaints by category.”⁸² Of note, the Department interpreted complaint sub-categories to be ready for implementation with the Utilities’ 2023 filings concerning data for 2022.⁸³ The Commission may wish for utilities to clarify when subcategories will be filed along with other required complaint data per MN Rule 7826.2000.

Staff wishes to flag that OTP’s largest percent of complaints were coded as alleged billing errors and the second highest category was complaints coded as “other.” Thus, staff’s concerns were not alleviated as there remains a lack of specificity in the complaints recorded as “other” despite the group having made changes to the category “inadequate service.” However, the ability to fit most complaints into a specific category, rather than list those complaints as “other” may signal progress in the direction of specificity, which was staff’s intention.

Finally, following the Commission’s Order regarding 2020 Service Quality data, the group also discussed Xcel’s inclusion of distributed energy resources (DER) complaints in its complaint

⁸² MP initial filing, April 1, 2022 p90-91. OTP agreed with the use of the new categories, explaining their understanding that the four subcategories for inadequate service would be first used in the April 2024 filing, as also stated in OTP’s initial filing, Docket No. E017/M-22-159, April 1, 2022, p65

⁸³ Comments, Department of Commerce, Docket No. E017/M-22-159 filed May 16, 2022, p25.

reporting.⁸⁴ Xcel, in discussions with the group, specifically the Commission's CAO, defined the following new subcategories:

Billing (10 Complaints received in 2021)

- Complaints related to the solar bill presentation not a rule or tariff
- Customer disputes solar credit.

Interconnection (13 Complaints received in 2021)

- Customer states delay in meter set for billing
- Customer states construction for solar account is delayed.
- Installer files complaint instead of customer

Other (14 Complaints received in 2021)

- PUC Inquiry
- Customer doesn't understand the installation of the solar system
- Unable to classify the complaint in a specific category

Xcel also explained its DER complaint process such that its, "Personal Account Representative (PAR) team, we track complaints received from all the Minnesota Renewable*Choice Programs (Solar*Rewards Community, Solar*Rewards, and Distributed Generation or standard Interconnection) through the CAO and the Minnesota Office of Attorney General."⁸⁵

Regulatory and CAO Staff are interested in the DER complaints received by Xcel. With respect to DER complaints generally, staff looks forward to data on time to resolution and method of resolution reported as would be for other types of complaints. Staff looks forward to this information in the Company's 2023 service quality filing. CAO team members have alerted staff to a trend in which many of Xcel's customers have been facing long response times after sending an initial inquiry to the Company regarding DERs in general and in particular, the interconnection process. To this extent, staff believes additional information would be useful (see Staff Analysis and **Decision Option 7**).

H. Website and Other Electronic Communications

Beginning with data for 2020, the Commission ordered⁸⁶ utilities to provide greater detail on electronic means of customer communication, beyond utility call centers. To establish a baseline, utilities were ordered to continue to provide information on electronic utility-customer interactions when filing 2021 data. More, beginning in April 2023 utilities were ordered "to provide percentage uptime and error rate percentage information in their annual reports for the next three reporting cycles, to build baselines for additional web-based service metrics."⁸⁷

⁸⁴ Order issued December 2, 2021 Docket Nos. E-015/ M-21-230; E-017/ M-21-225; E-002/ M-21-237, para 6.

⁸⁵ Xcel initial filing part 1 filed April 1, 2022 docket no. E002/M-22-162, p15.

⁸⁶ Order issued December 18, 2020 Docket Nos. E-017/ M-20-401; E-015/ M-20-404; E-002/ M-20-406, para 14.

⁸⁷ Order issued December 2, 2021 Docket Nos. E-015/ M-21-230; E-017/ M-21-225; E-002/ M-21-237, paras 2-4,

Table 15. Reporting Required by Commission Order⁸⁸

	Yearly total website visits	Yearly total logins via electronic customer communication platforms	# Emails or other electronic communication received, categorized by subject	% Uptime and Error Rate for website, payment services, and outage info (April 2023)
OTP	✓	✓	✓	
MP	✓	✓	✓	
Xcel	✓	✓	✓	

A check mark (✓) indicates the required data were included in the utility's annual report filed April 2022.

Table 16. Yearly Total Electronic Customer Communication

UTILITY	YEAR	MY ACCOUNT	WEBSITE	SOCIAL MEDIA*	EMAILS	TOTAL CALLS TO CALL CENTER**
OTP	2020	N/A	2,349,795	32,983	2,294	55,180
	2021	72,108	2,314,977	37,705	5,701	53,747
MP	2020	339,242	1,314,540	35,111	12,722	133,453
	2021	490,667	1,598,725	62,333	16,927	142,306
XCEL	2020	15,910,472	12,673,590		235,210	2,555,155
	2021	17,818,268	14,351,582		121,679	2,493,516

The data used in this table represents Xcel's **revised data** filed in the Company's Reply Comments on June 24, 2022 and thus, are not reflected in the Department's comments below.

* Social Media could include Facebook, Instagram, LinkedIn, and / or Twitter.

**Xcel's measure includes all calls offered to agents plus IVR answered billing and outage calls. MP's measure includes calls made during and outside of business hours. OTP's measure does not include abandoned calls.

Table 17. Most Frequently Reported Email Category in 2021

OTP	MP	Xcel
Meter Readings (44%)	Fuel Assistance ⁸⁹ (41%)	Billing Inquiry (37%)
Starting service (13%)	Not Specified (14%)	Start/Stop/Transfer (32%)
Changing mailing address (12%)	Miscellaneous (12%)	My Account (18%)

For each utility, the most frequent subjects reported in 2021 were very similar to those each reported in 2020.

quoted text para 3.

⁸⁸ Order December 2, 2021 DOCKET NOS. E-015/ M-21-230; E-017/ M-21-225; E-002/ M-21-237

⁸⁹ MP initial filing, April 1, 2022, p63. Emails categorized as fuel assistance pertain to energy assistance inquiries. Separate categories are used for emails about Customer Affordability of Residential Electricity ("CARE") affordability program and disconnect/reconnects but fewer than 100 emails were received in these categories.

OTP Yearly customer contacts increased by 148.5% compared to 2020. OTP's yearly log-in/visits to electronic customer communication platforms increased dramatically, but only due to the inclusion of "MyAccount" log-ins which, were reported for August – December 2021 only. Staff is unsure if OTP did not have a My Account feature until 2021 or that My Account data were just not included in the 2020 report. Moving forward, OTP's reporting system has been modified to include My Account data.

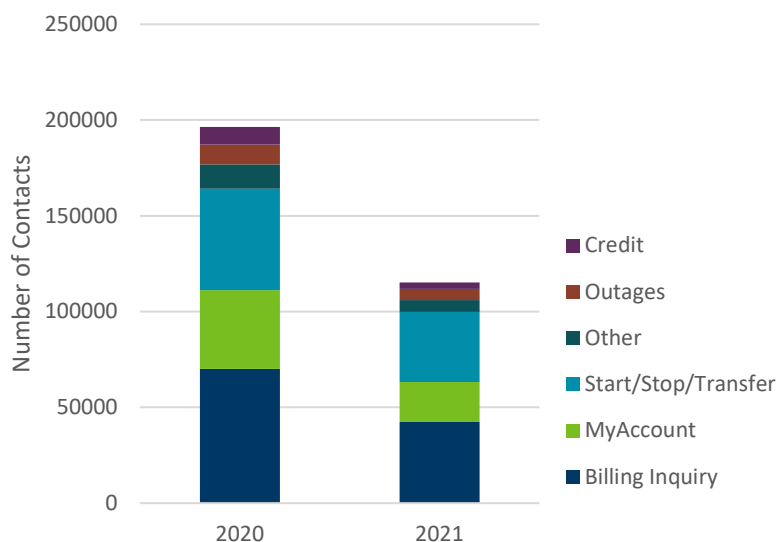
Department Comment. OTP reported the required data.⁹⁰

MP Electronic email communications increased dramatically from 2020: website visits increased by 21.6% and the number of customer contacts to the utility increased by 33%.

Department Comment. MP had increased internet-based communication from its customers and viewed, "these increased levels of interaction as a positive."⁹¹

Xcel Website visits increased 13.2% compared to 2020. However, unlike the other two utilities, the number of recorded customer contacts was down 41% from 2020, with decreases distributed evenly across call categories (Fig. 10). Yearly logins to Xcel's electronic customer communication platforms remained relatively steady between 2020 and 2021. Xcel's mobile app continues to be the electronic customer communication platform with the most logins.

Figure 10: Xcel's Yearly Customer Contacts by Subject



Xcel explained that the number of overall customer contacts decreased due to the Pandemic-prompted moratorium on credit activities. More, Xcel, "identified a "one-time" system glitch that occurred during a web development phase where we believe we lost some tracking capabilities. The system issue has since been corrected and additional internal reporting has

⁹⁰ Comments, Department of Commerce, Docket No. E017/M-22-159 filed May 16, 2022, p25.

⁹¹ Comments, Department of Commerce, Docket No. E015/M-22-163 filed May 26, 2022, p26.

been put into place to identify sudden changes in any channel. We continue to monitor these channels to determine if 2020 was an anomaly due to COVID and if customers are moving to alternate modes of communication with the Company.”⁹²

Department Comment. The Department wrote that the decrease in emails received from 2020 to 2021, “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.”⁹³

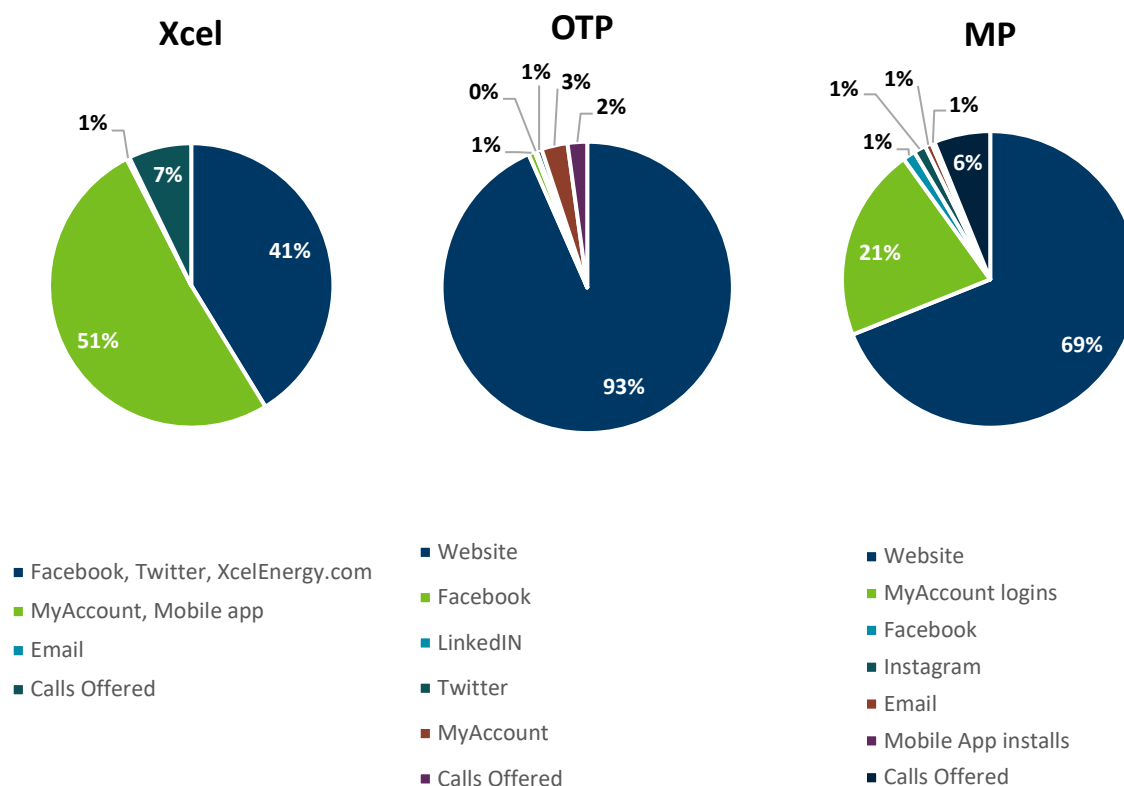
Xcel Reply. Xcel provided several explanations for the decreases about which the Department had inquired. First, the Company observed that overall customer satisfaction tended to be higher with phone call transactions as opposed to email transactions. Thus, data reflect customer preference. Also, Xcel is rolling out a process to automate its change of tenant process. Xcel reported successful automation of 55% of this process. The 55% that are currently fully automated are completed the same day the customer submits a request and has decreased the actual email or calls to their customer care call center. Finally, Xcel noted a discrepancy in how its first two years of baseline data were collected. Revised numbers were attached to the reply [reflected in Table 16] and efforts towards reporting refinements are underway.⁹⁴

Staff Analysis. As the first year of reporting was during the first year of the pandemic and utilities are in the process of reporting three years of baseline data, it may be difficult to make any solid conclusions about reported increases or decreases. The pie charts below do indicate the importance of website and my account as a means of communicating information to customers, more so than each utility’s call center.

⁹² Xcel initial filing April 1, 2022 docket no. E002/M-22-162 p16-17.

⁹³ Comments, Department of Commerce, Docket No. E002/M-22-162 filed June 2, 2022, p23.

⁹⁴ Xcel reply comments Docket No. E002/M-22-162 filed June 24, 2022, p6-7

Figure 11: Customer Communication Methods by Electric IOU 2021

*Xcel includes Facebook and Twitter with their count of website visits

I. Public Facing Summaries

In response to Commission Order, all three utilities submitted a public facing summary.⁹⁵ Copies of the summaries are included as Attachment A. Summaries have also been placed on OTP's website otpc.com/OurGuarantee.com. However, staff was unable to easily locate the report on OTP's website or using the supplied link. Staff could not easily find the report on MP's nor Xcel's websites. Staff recommends utilities place a PDF copy of the report and share the report in full on their "About Us" pages.

J. Locational Reliability and Equity Information and Interactive Map

Xcel Energy made locational reliability and equity information available on its website on April 1, 2022 and provided a link in its 2021 Annual Report in the instant docket. The Department concluded that Xcel appears to have fulfilled the requirements of the Commission's December

⁹⁵ Order issued December 2, 2021 Docket Nos. E-015/ M-21-230; E-017/ M-21-225; E-002/ M-21-237, para 7.

18, 2020, Order in Docket No. E002/M-20-406.⁹⁶ Staff notes the map map was developed to comply with three future metrics in Xcel's Performance Based Rate-Making docket no. E002/CI-17-401. Staff will issue a Notice of Comment Period about the map separately in Docket 20-406.

K. Xcel's Customer Satisfaction Scores

The Department analyzed these data and reported, "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. [With respect to Table 16] 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. [With respect to Table 17] 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."⁹⁷

Xcel Reply. With respect to changes in residential customer satisfaction levels from 2020 to 2021, Xcel stated, "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."

Xcel provided a similar explanation for its Small Commercial Satisfaction results, such that due to the small sample size of 285 respondents, "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)."⁹⁸

⁹⁶ Comments, Department of Commerce, Docket No. E002/M-22-162 filed June 2, 2022, p25.

⁹⁷ Comments, Department of Commerce, Docket No. E002/M-22-162 filed June 2, 2022, p30-32.

⁹⁸ Xcel Trade Secret Reply Docket No. E002/M-22-162 filed June 24, 2022, p2-4.

V. Staff Analysis

Staff has made analyses throughout each section of the briefing paper. In this final section, staff will highlight areas where the Commission may monitor, request more information during the agenda meeting, and / or take further action. Broadly, after reviewing each utility's filing, staff concludes that service provided to customers in 2021, despite still functioning in the context of a global pandemic, was reported in accordance with MN rules, met or exceeded performance expectations of Rules in most instances, and often improved to align with pre-Pandemic levels. As such, staff concur with the Utilities and the Department that the Commission should accept each utilities' 2022 report (**Decision Option 1**).

A. Meter Reading

Monitor MP's Remote Reconnect voluntary pilot began operation, using AMI meters to reconnect disconnected participants without any fee. Staff will continue to monitor data as the three-year pilot progresses.

Monitor & Inform With respect to the increased number of meters not read by Xcel for 12+ months, staff does not think additional action is necessary. Action does not seem necessary due to the high levels of meters that were read by utility personnel, above 96% for 2017-2021, fulfills MN Rules 7826.1400. Instead, staff will continue to monitor these data. However, the Commission may wish for Xcel to explain the trend of an increasing number of industrial meters unread for 12+ months.

Further Action Staff requests Xcel provide current and historical data on discreet meters not read for 6-12 months and 12+ months (**Decision Option 6**).

B. Involuntary Disconnections

Monitor & Inform Staff notes some customers receive multiple disconnection notices, evidence of difficulties setting up or following through on a payment plan arrangement. Utilities may want to consider new practices to increase payment plan success.

For example, the Commission may wish to inquire how Xcel was able to establish so many more payment plans in 2021, almost 50% more than in Xcel's next highest year. Xcel may have effective practices to share with other utilities.

Monitor & Inform All utilities saw growing arrearages for residential customers. Staff will continue to monitor this trend, especially in 2022 after a full year will have elapsed since utilities returned to normal operating procedures, including disconnections.

Monitor & Inform Utilities may use a combination of payment plans and full balance repayment to restore disconnected customers to service. The Commission may wish to inquire about the relationship between utilities' use of payment plans and threshold to restore service in 24 hours, especially considering the method by which OTP customers were returned to service changed in 2021, compared to 2020 and any additional role of MP's Remote Reconnect pilot beyond increased speed at which qualified customers could be returned to service.

C. Service Installations

Monitor All three utilities continue to work within relatively new SAP / customer information systems (CIS). While MP and Xcel's data indicated to staff a greater level of comfort with the new system, OTP stated that a team continues to review OTP's CIS to identify process improvements. OTP's action is perhaps prompted by an increased time needed to serve both new and previously served locations. Staff looks forward to 2022 data to assess any trends.

Monitor & Inform Both staff and the Department noted a trend in which Xcel's response time to not previously served commercial and industrial locations has been stretching longer than the install date requested by the customer. As staff noted, this may be a function of a small sample size; however, as response time has been increasing, the Commission may wish Xcel to offer some explanation. More, as percent of meters unread for industrial customers has been increasing, the Commission may wish to inquire about overall customer service to Xcel's industrial customers.

D. Call Center

Inform As MP answered only about half of calls in the time limits prescribed by rule, MP may wish to offer another update as to whether it remains short staffed or is fully staffed but in the process of training new staff.

Inform Agent-only response time in Xcel's call center does not comply with MN Rule. While staff acknowledges state-wide staff shortages and that some customers may prefer use of IVR, other customers may not appreciate the long wait times when choosing to speak to a call center representative. The Commission may wish for Xcel to explain what else can be done to meet responsiveness goals as set in MN Rule 7826.1200.

E. Emergency Medical Account Status (EMS)

Inform In staff's opinion, Xcel engaged in a thorough outreach effort to enroll qualified customers in EMS. Xcel may wish to share lessons learned or additional changes to its outreach practices, following reflection of a perhaps lower-than-expected number of enrollments.

F. Complaints

Inform In response to an increase in billing error complaints made by OTP customers, the Commission may ask the Company to clarify that this is the result of changes to how data are categorized, not a new problem with customer bills. The Commission may also wish to follow up with MP regarding increased time for complaint resolution. In doing so, MP may choose to confirm or reject staff's hypothesis.

G. Electronic Customer Communication

Inform Given that there are no data on My Account logins for 2020, OTP may wish to confirm when it added this feature for customers.

Inform and Further Action Staff would like Xcel to comment on the feasibility of providing response time following initial inquire for all customer contacts to the Company regarding DERs. The Commission is tasked with regulating public utilities for the provision of adequate and reliable services at reasonable rates. More, Minnesota looks to address greenhouse gas emissions “to a level at least 15 percent below 2005 levels by 2015, to a level at least 30 percent below 2005 levels by 2025, and to a level at least 80 percent below 2005 levels by 2050 (MN Statute 216H.02 Subdv. 1).” Progress towards these goals can be aided by distributed generation. Indeed, MN Statute 216B.1611 conceptualizes DERs and their interconnection to the grid as a way to enhance reliability and economic efficiency. More, Minn. Stat. 216B.164 describes the scope of the state’s implementation of the Public Utility Regulatory Policies Act (PURPA) as giving “maximum possible encouragement to cogeneration and small power production consistent with protection of the ratepayers and the public.”

Understanding customer interactions during the process of interconnecting a DER would shed light into an important space for utilities and customers to work together to address broader conservation and reliability goals. Specifically, as Utilities are tasked with reporting the volume of interconnection request as well as “correspondence regarding each application” received for interconnection and parallel operation of distributed generation (216B.1611 Subd. 4(a)) staff believes this additional information would serve the Commission well in terms of understanding, in part, the customer experience of interconnection (**Decision Option 7**).

H. Public Facing Summaries

Further Action Staff believes utilities have provided good service to Minnesota ratepayers. Following the Commissions intention when requesting public-facing summaries, such that summaries would be “digestible and usable for general audiences,” staff requests each utility more prominently display those summaries on their website (**Decision Option 8**).⁹⁹

⁹⁹ ORDER ACCEPTING REPORTS, SETTING FILING REQUIREMENTS, AND GRANTING WITHDRAWAL OF RECONNECT PILOT PROPOSAL issued May 14, 2019 Docket Nos. E-002/M-18-239, E-017/M-18-247, E-015/M-18-250, p2.

VI. Decision Options

1. Accept Otter Tail Power, Minnesota Power, and Xcel Energy's 2021 Safety, Reliability, and Service Quality reports (*Xcel, MP, OTP; Department confirmed for Xcel and OTP only*).

Volume 1 Decision Options

Staff note: a supplemental filing is required after the IEEE benchmarking data is posted, as that does not happen until after the April 1 filing deadline. This is consistent with last year's reports, and included in the decision options setting each utility's benchmarking standards for 2022. Decision Options 2-4 maintain the same IEEE benchmarking comparisons (e.g. 2nd quartile and utility size) for the utility's 2021 and 2022 reliability standards.

2. Set Minnesota Power's 2022 statewide Reliability Standard at the IEEE benchmarking 2nd Quartile for medium utilities. Set Minnesota Power's work center reliability standards at the IEEE benchmarking 2nd quartile for small utilities. Require a supplemental filing to Minnesota Power's 2022 SQSR report 30 days after IEEE publishes the 2022 benchmarking results, with an explanation for any standards the utility did not meet. (*Minnesota Power, Department*)
3. Set Otter Tail Power's 2022 statewide Reliability Standard at the IEEE benchmarking 2nd Quartile for medium utilities. Set Otter Tail's work center reliability standards at the IEEE benchmarking 2nd quartile for medium utilities. Require a supplemental filing to Otter Tail Power's 2022 SQSR report 30 days after IEEE publishes the 2022 benchmarking results, with an explanation for any standards the utility did not meet. (*Otter Tail Power, Department*)
4. Set Xcel Energy's 2022 statewide Reliability Standard at the IEEE benchmarking 2nd Quartile for large utilities. Set Xcel's Southeast and Northwest work center reliability standards at the IEEE benchmarking 2nd quartile for medium utilities and Xcel's Metro East and Metro West work center reliability center standards at the IEEE benchmarking 2nd quartile for large utilities. Require a supplemental filing to Xcel Energy's 2022 SQSR report 30 days after IEEE publishes the 2022 benchmarking results, with an explanation for any standards the utility did not meet. (*Xcel, Department*)
5. Initiate a work group to simplify Xcel Energy's SQSR reporting requirements. The workshop shall file recommendations or a progress update with the 2023 SQSR report. (*Xcel, Department*)

Staff Recommends decision options 1-5

Volume 2 Decision Options

6. Require Xcel Energy to provide, beginning with its April 1, 2023 service quality filing, an additional data set that reports discreet meters unread for 6-12 months and 12+ months, with a single meter listed in the longest appropriate category only, in Xcel



Energy's reporting under MN Rules Section 7826.1400. To the extent possible, include historic data in this format as well, with the past five years being optimal. *(Staff)*

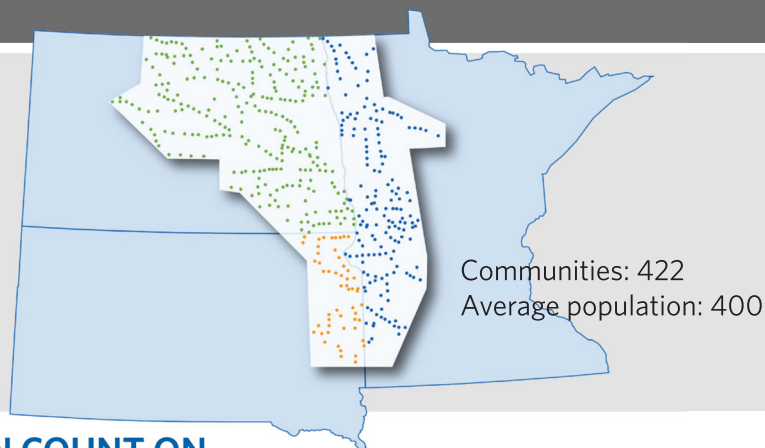
7. Xcel shall document response duration in days, beginning from the date of initial customer contact to the date of Company reply, for inquiries, complaints, or disputes related to DERs and/or the interconnection process that are received through Xcel's call center, email, or otherwise. Information shall be shared in a .xlsx format in the Company's 2023 service quality filing and in the temporary annual report in Docket No. E999/CI-16-521. *(Staff)*
8. Xcel Energy, Minnesota Power, and Otter Tail Power shall each display, either directly or via a link to a PDF file, the utility's public facing summary, as shown in Attachment A, on the utility's website placed such that the summary is available to a website user after a single click away from the home page. *(Staff)*

2021 MINNESOTA SAFETY, RELIABILITY, AND SERVICE QUALITY

Our focus on reliable electricity and timely, courteous customer service

OUR MISSION

To produce and deliver electricity as reliably, economically, and environmentally responsibly as possible to the balanced benefit of customers, shareholders, and employees and to improve the quality of life in the areas in which we do business.



RELIABLE ELECTRICITY CUSTOMERS CAN COUNT ON

We strive to minimize the frequency and duration of service interruptions. And we deploy field personnel as safely and quickly as possible to restore power to customers when interruptions occur.

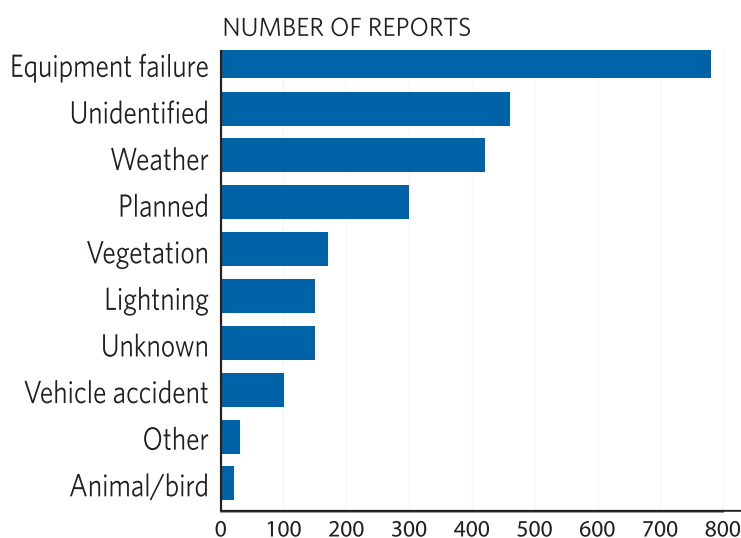
Two of the ways we measure our reliability include the average number of interruptions and average length of time our customers are without power.



SAFETY

In 2021 no injury-related incidents were reported that required medical attention as a result of downed wires or other electrical system failures.

WHAT CAUSES INTERRUPTIONS?



1.07% of our customers experienced an interruption greater than **six hours**.



3.48% of our customers experienced four or more interruptions lasting greater than **five minutes**.

Keeping our lines clear of trees and other vegetation helps ensure safe and reliable service. We trimmed **900 miles** of transmission line in 2021.



OUTAGE PREVENTION

As part of our long-term reliability strategy, we regularly perform critical analyses of our transmission and distribution systems.

We'll continue investing in innovative, resourceful ways to create a more resilient regional transmission grid, including:

- Identifying areas requiring proactive maintenance.
- Integrating geographic information system data.
- Expanding continuous improvement workshops to improve efficiencies and processes.



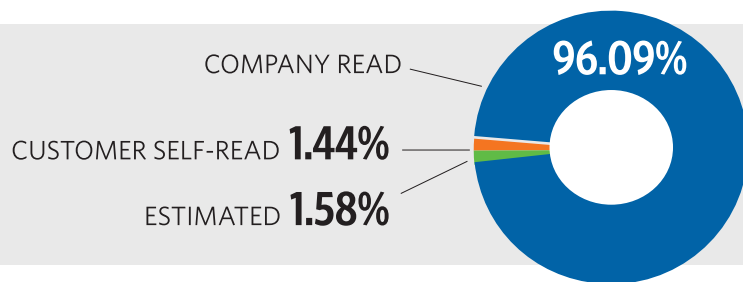
CUSTOMER SERVICE TEAM

We're here so our customers can focus on what matters most.

If there's a power outage, our customer service team is ready to help. In 2021, **168 linemen and service representatives** were available to safely and quickly restore power to our customers.

Company-read meters

Our service representatives and contracted meter readers read almost all of our residential meters to ensure accuracy in billing.



HIGH SERVICE STANDARDS

Our **28 customer service representatives** and lead customer service representatives are ready to assist our customers.

In 2021 our team received over **53,000 customer calls** during business hours. Of those, we answered **93%** within **20 seconds**.

We promoted several resources during more than **26,000 outbound calls** throughout our service area to customers in need, offering:

- Payment plans.
- Protection under the Minnesota Cold Weather Rule.
- Energy assistance options.



MOVING?
WE TURN ON ELECTRICITY QUICKLY!

94%
of locations we've
previously served
receive electricity
within 24 hours.



800-257-4044 or 218-739-8877
or visit **otpc.com**



- Facebook.com/OtterTailPowerCo
- Twitter.com/OtterTailPwrCo
- YouTube.com/OtterTailPowerCo
- LinkedIn.com/Company/Otter-Tail-Power-Company

The public summary communication regarding Minnesota Power's 2021 SRSQ results is included below.

2021 SAFETY, RELIABILITY, AND SERVICE QUALITY

OUR MISSION: *Together we will safely and reliably create and deliver vital energy to enhance security, comfort, and quality of life.*

Minnesota Power, a division of ALLETE Inc., is committed to the reliability and security of the regional power system that provides electricity in a **26,000-square-mile electric service area** in northeastern Minnesota.

MINNESOTA POWER PROVIDES OVER 99% RELIABILITY for its residential, commercial and industrial customers.
Reliability is having the energy when it's needed.

MINNESOTA POWER SERVICE TERRITORY

CUSTOMER SERVICE: Minnesota Power is dedicated to providing safe, reliable, affordable and increasingly clean electric service and to achieving high levels of customer satisfaction.

- In 2021, we received **123,019 customer calls** in our Call Center. Our customer care and support representatives answered **50% of incoming phone calls** during business hours **within 20 seconds**.
- In 2021, **102 lineworkers and 21 substation technicians** responded to trouble calls and worked on maintenance of our distribution lines and associated equipment.
- In 2021, **51 employees** working in a variety of positions, including vegetation management and system operations, provided line operation support.

COMPANY READ METERS:
In 2021, our meter reading systems and meter reader collectors read nearly all of our residential meters in an effort to ensure customer bills are accurate.

Meter reading by method:

Meter reading by method	Percentage
Company reads	97.75%
Customer self-reads	0.04%
Estimated	2.21%

COMMUNICATIONS: We communicate with our customers in person; by phone; through news releases, media, direct mail and bill inserts; on **mnpower.com**; through MyAccount at **mnpower.com/myaccount**; and via the Minnesota Power app.

NEED INFORMATION OR ASSISTANCE?

Customer Service: **1 (800) 228-4966** or **CustomerService@mnpower.com**
 Minnesota Relay/TTY: **711** or **(800) 627-3529**
 COVID-19 FAQs: **www.mnpower.com/CustomerService/Covid19FAQ**
 Report an outage or enter a trouble order:
www.mnpower.com/OutageCenter/ReportAnOutage or call **800-30-POWER (218-307-6937)**; if emergency, call **911**.

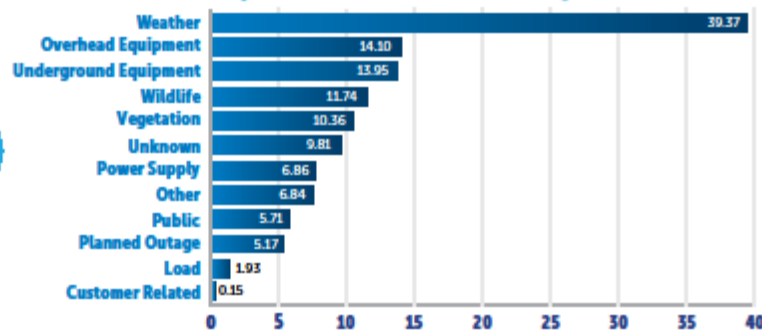
SYSTEM RESILIENCY

Interruptions are the total loss of electric power to one or more customers connected to the distribution system.

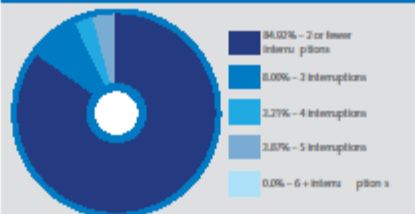
What causes Interruptions?

A higher frequency of windstorms was a major contributor to weather being the largest reliability factor in 2021. Minnesota Power is making investments and executing several reliability and resiliency initiatives to strengthen the company's system in coming years.

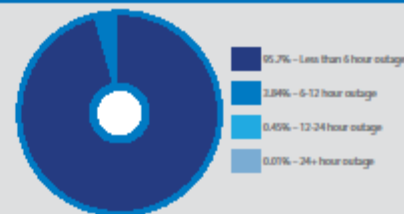
Major event excluded SAIDI by cause



About 84.92% of customers experienced 2 or fewer interruptions in 2021.

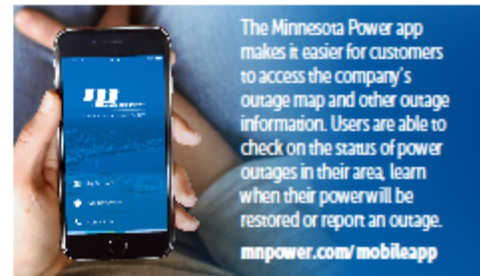


95.7% of customers experienced outages less than 6 hours in length



We work to minimize weather-related outages in a variety of ways, including:

- **Using Trip Saver technology** to minimize long duration outages and dispatch of service technicians.
- **Providing resiliency during storm events** and strategically strengthening the distribution system through our strategic underground initiative.
- **Optimizing the use of a secure fiber-optic network** and technology to quickly isolate and restore customers through the use of intellirupters and motor operated switches.



The Minnesota Power app makes it easier for customers to access the company's outage map and other outage information. Users are able to check on the status of power outages in their area, learn when their power will be restored or report an outage.

mnpower.com/mobileapp



MUTUAL AID: Minnesota Power is a respected mutual aid partner lending assistance in the Midwest as a member of the Midwest Mutual Assistance Group as well as on a national level. Crews and line support staff have assisted on many natural disasters over the years including snow and high windstorms, hurricanes and wildfires.

In recognition of our mutual aid, Minnesota Power received an Emergency Assistance Award from the Edison Electric Institute for our responses to a nor'easter in New York in 2021, a derecho in Illinois in 2020, a severe snow and windstorm in Manitoba in 2019, and hurricanes in Puerto Rico in 2018, and Miami in 2017.

Figure 2: Minnesota Power's Public Summary for 2021

DELIVERING CLEAN, SAFE, RELIABLE ELECTRICITY

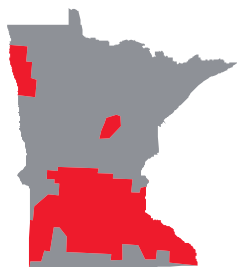
INFORMATION SHEET
MINNESOTA

MINNESOTA SERVICE QUALITY AND RELIABILITY



ABOUT XCEL ENERGY MINNESOTA

At Xcel Energy, we provide our customers with safe, clean, reliable electricity at a competitive price.



1.3 million
electric customers served in Minnesota



99.983%

Percentage of time
Minnesota customers
had power in 2021*



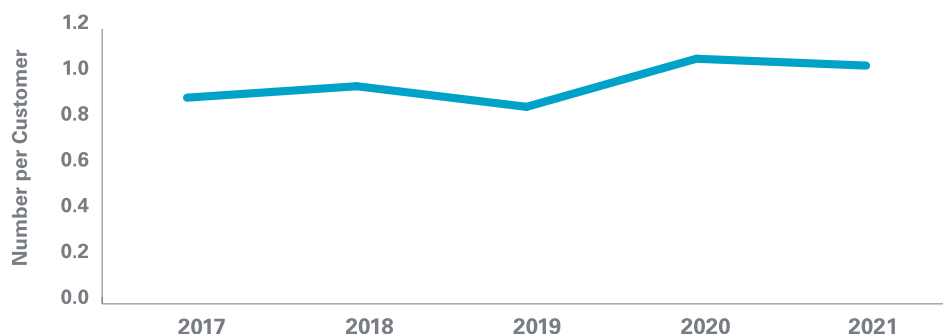
**89
minutes**

Average total time a customer
was without power in 2021**

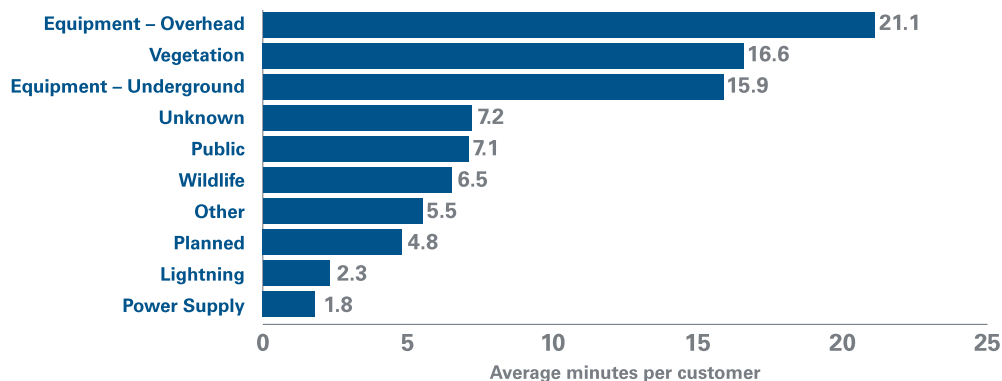
OUR COMMITMENT TO RELIABILITY

Each year, we report on various measurements of electric service reliability. Each measurement typically has two numbers: one number includes all outages during the year, including outages caused by major events like high-impact storms, and the other number excludes outages caused by major events. Here are some highlights.

Average number of outages per customer †



Top ten outage causes in 2021 **

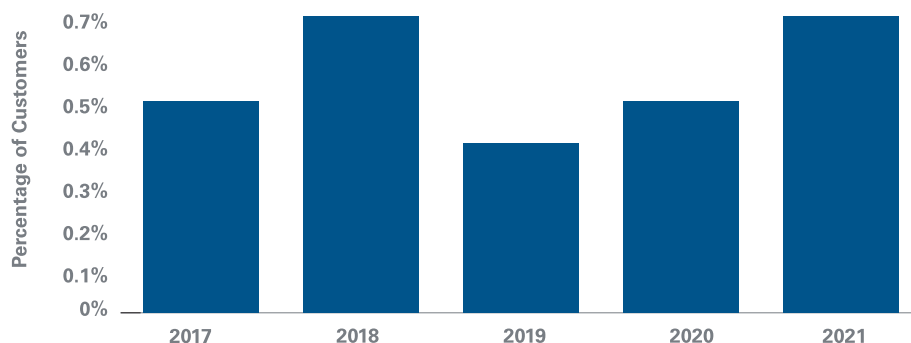
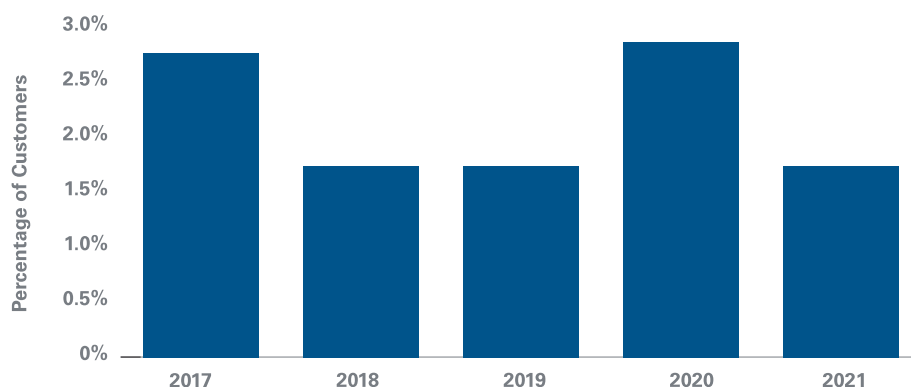


*Also known as Average Service Availability Index, or ASAI. Excludes major event days, which include high-impact storms.

**Also known as System Average Interruption Duration Index, or SAIDI. Excludes major event days, which include high-impact storms.

† Also known as System Average Interruption Frequency Index, or SAIFI. Excludes major event days, which include high-impact storms.

All figures represent 2021 averages for all Minnesota customers, unless otherwise noted.

Percentage of customers with more than six power outages^{††}Percentage of customers with a power outage lasting longer than twelve hours[§]

2021 Reliability Performance Results

Minnesota	
Average outage duration per customer **	88.83 minutes
Total number of outages per customer †	0.92
Average outage length ***	96.33 minutes



5,346

New residential electric service installations completed in 2021



5.7 days

Average time to complete a new residential service installation

The Company has averaged 250.6 customer complaints per year over the five years from 2017 to 2021. This compares to an average of 363.3 complaints allowed under the Company's Service Quality Tariff during those years.

CONTACT INFORMATION

Customers can contact us and learn more by visiting [xcelenergy.com](https://www.xcelenergy.com), calling customer service at **800-895-4999**, or finding us on Facebook or Twitter.

If you believe we have not resolved your concerns, you may contact the Minnesota Public Utilities Commission, Consumer Affairs Office at 651-296-0406 or 800-657-3782 or email at consumer.puc@state.mn.us at any time.

^{††}Also known as Customers Experiencing Multiple Interruptions, or CEMI, includes major event days

[§] Also known as Customers Experiencing Lengthy Interruptions, or CELI, includes major event days

^{**}Also known as System Average Interruption Duration Index, or SAIDI.
Excludes major event days, which include high-impact storms.

[†] Also known as System Average Interruption Frequency Index, or SAIFI.
Excludes major event days, which include high-impact storms.

^{***} Also known as Customer Average Interruption Duration Index, or CAIDI.
Excludes major event days, which include high-impact storms.

