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January 20, 2023

—Via Electronic Filing—

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

RE: REPLY COMMENTS
COMMISSION INVESTIGATION TO IDENTIFY AND DEVELOP PERFORMANCE
METRICS AND, POTENTIALLY, INCENTIVES FOR XCEL ENERGY'S ELECTRIC
UTILITY OPERATIONS AND ANNUAL REPORT ON SAFETY, RELIABILITY, AND
SERVICE QUALITY AND PETITION FOR APPROVAL OF ELECTRIC RELIABILITY
STANDARDS
DOCKET NOS. E002/ CI-17-401 AND E002/ M-20-406

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits these Comments in response to the December 2, 2022 Notice of Comment submitted by the Minnesota Public Utilities Commission in the above-referenced docket.

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

Sincerely,

/s/

BRIDGET N. DOCKTER
MANAGER, POLICY AND OUTREACH

Enclosures
c: Service Lists

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

IN THE MATTER OF A COMMISSION
INVESTIGATION TO IDENTIFY AND
DEVELOP PERFORMANCE METRICS AND,
POTENTIALLY, INCENTIVES FOR XCEL
ENERGY'S ELECTRIC UTILITY
OPERATIONS AND ANNUAL REPORT ON
SAFETY, RELIABILITY, AND SERVICE
QUALITY AND PETITION FOR APPROVAL
OF ELECTRIC RELIABILITY STANDARDS

DOCKET NO. E002/CI-17-401
E002/M-20-406

REPLY COMMENTS

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits these Reply Comments in response to Comments filed by the City of Minneapolis (City) and the joint Comments filed by the Environmental Law & Policy Center and Vote Solar (ELPC/VS) on January 6, 2023 in the above-referenced docket.

REPLY COMMENTS

The Company appreciates the opportunity to respond to Comments submitted regarding our interactive map established within the Service Quality proceeding in Docket Nos. E002/CI-17-401 and E002/M-20-406. We appreciate the parties' participation in this docket and their thoughtful consideration and review of the issues addressed in the Commission's Notice for Comment.

Given the issues raised by the parties, the Company believes it is appropriate to retain an experienced third-party consultant to assist us in developing a systematic approach to understanding whether, and to what extent, communities with higher levels of poverty and/or higher proportion of people of color face disparities in reliability,

disconnections, or participation in low-income energy assistance and/or energy efficiency programs. For example, commonly used thresholds – areas where at least 40 percent of people report income at or below 185 percent of the federal poverty level, and areas where 50 percent or more of residents are people of color – are often used to identify such communities. The Minnesota Pollution Control Agency uses these thresholds to define “areas of increased concern for environmental justice,”¹ and we use the same thresholds as demographic layers in our interactive map. A consultant can help us to assess whether the existing metrics provided in the map are sufficient to evaluate our performance in such communities, or whether additional metrics are necessary.

We will address topics raised by both parties first, then some of the individual topics raised by each commenter.

I. Third Party Analysis is Needed

The Company believes the existing metrics, which were largely agreed to by the Commission-ordered technical work group² and are provided in the map, provide a comprehensive and easy to understand picture of our reliability and customer access to our low-income energy efficiency and energy assistance programs, coupled with disconnection rates. We understand there may be differing interpretations by parties as to the value of these metrics to determine impacts on equity of service to our customers. For this reason, we believe a third-party consultant with experience in this area will be useful to assist us in evaluating the current data to help us to determine whether and to what degree disparities in reliability, disconnections, or participation in low-income energy assistance and/or energy efficiency programs exist and are correlated to poverty and/or race and whether any modifications to our current processes and programs may be necessary.

II. Establishing a Baseline

Both the City and ELPC/VS recommend that additional metrics be both reported and included on the newly established interactive map. The charge of the technical workgroup was to consider what information should be mapped and how it should be reflected on the interactive map. We believe it may be premature to add additional metrics to the interactive map at this time and prefer to first conduct an analysis on the five existing metrics – (1) CELI-12, (2) CEMI-6, (3) percent of customers

¹ See MPCA’s GIS mapping tool, [Understanding environmental justice in Minnesota \(arcgis.com\)](https://arcgis.com), available at [Environmental justice | Minnesota Pollution Control Agency \(state.mn.us\)](https://state.mn.us).

²ORDER ACCEPTING REPORTS, REQUIRING ADDITIONAL FILINGS, AND ESTABLISHING WORKSHOP, December 18, 2020, Docket No. E-002/M-20-406

experiencing one or more involuntary disconnections in a year (4) low-income energy efficiency program participation, and (5) energy bill assistance program participation – to determine whether these metrics reveal any systematic disparities in relation to poverty and race. These five metrics may be adequate to understand such disparities, if any, and take action to remedy them, rather than focusing efforts on adding additional metrics to the interactive map.

As we stated in our Initial Comments, the interactive map was developed to be used by both the Company and stakeholders to provide insight and recommendations to the programs and quality of service we provide our customers. Consistent with our request, and the Commission’s approval in the Performance Based Ratemaking docket,³ we believe it is important to establish a baseline of the current approved data prior to adding more metrics. For this reason, we are tracking and will continue to track the five metrics. Also consistent with the PBR precedent, we believe we should collect three years of baseline data before initiating a discussion of whether and which metrics should be assigned incentives/penalties. However, if the analysis of the data does reveal disparities, we would act on this immediately to try to rectify them – e.g. improve reliability, reduce disconnections, improve low-income program participation in those census block groups.

III. RESPONSE TO THE CITY OF MINNEAPOLIS

We provide our responses to some of the City’s Comments next.

A. Augmenting Rates of Participation in Low-Income Energy Efficiency Programs

The City recommends that we add to the map current low-income energy efficiency program participation by census tract, in addition to the now reported census block group as well as:

- total low-income energy efficiency program funding for the year (\$); and
- average program benefit (\$ per participant).

The City indicates reporting by these breakdowns will further the low-income program realization of weatherization, lighting, and efficient appliances. We fully support finding the most effective ways to serve our customers. However, in our annual Clean Energy Partnership reports, we already provide the City with participation and mapping of our low-income programs within the City by census

³ORDER ACCEPTING REPORT AND SETTING ADDITIONAL REQUIREMENTS, February 9, 2022, Docket No. E-002/CI-17-401

tract. Additionally, we provide total customer participation in our low-income energy efficiency and affordability programs as well as total spending. The per-customer cost can be determined by dividing total spending by total participants; and, therefore, we do not believe it is necessary to duplicate this information in the interactive map. Data from 2018-2021 can be found on pages 36 and 38 of the latest report.⁴

In our experience, these additional data incorporated into a geographic based tool such as the interactive map would not provide greater transparency into program delivery. Per participant cost and total spending is also currently available in our annual Conservation Improvement Program (CIP) Status Reports. Annual program funding includes many elements that are not tracked or distinguishable at the geographic level of census block group such as program promotion, administrative costs and measurement and verification. As indicated above, the Company is open to retaining a consultant to analyze correlations between energy efficiency low-income program participation and demographic data such as race and poverty. The Company can then consider actions such as those referenced in our comments through our energy efficiency process and/or explore which metrics (if any) would better measure equity in delivery of these programs.

B. Electric Disconnection

While the City indicates the disconnection information provided in the map is appropriate, it references recommendations made by the University of Michigan's Energy Equity Project Report, particularly related to auto enrollment in affordability and energy efficiency programs. The Company has begun to explore these opportunities as well. We recently worked with the Minnesota Citizens Utility Board (CUB) and the Energy CENTS Coalition (ECC) to develop an auto enrollment process for customers in our Gas Affordability Program. For those customers enrolled in our Gas Affordability Program, and for whom we also provide electric service, we will automatically enroll them in our electric affordability program, PowerOn. The Commission approved our Gas Affordability Program request on January 11, 2023.⁵ Accordingly, we will file the necessary tariff modifications and plan to begin the auto enrollment process this spring.

⁴ [Minneapolis Clean Energy Partnership \(mplscleanenergypartnership.org\)](https://mplscleanenergypartnership.org), 2021 Annual Report, Pages 36 and 38.

⁵ In the Matter of Northern States Power Company dba Xcel Energy's Gas Affordability Program Evaluation Report, Docket No. G002/M-22-257.

C. Reliability

Both the City and ELPC/VS's comments recommend reporting CEMI-1 in addition to the CELI-12 and CEMI-6 metrics currently included in the map. We note that, according to Table 1 of the City's Comments, only two other utilities report CEMI-1. Higher CEMI intervals are more commonly reported. We believe the CEMI-1 metric is not useful in identifying service reliability needs and gaps because the occurrence of a single outage in 12 months is ubiquitous and not indicative of a service quality shortfall. However, as mentioned, we will work with our consultant to analyze whether additional metrics are useful.

The City compares the 2021 Energy Information Administration (EIA) reported reliability metrics of the Company to four other utilities in the Twin Cities area. We agree with the City's statement that there is opportunity to improve service reliability for our Minnesota customers. However, the reliability metrics of co-ops, municipal utilities, and investor-owned utilities involve a variety of different factors.

The City also includes in their recommendation that the Commission "*Direct Xcel to close the reliability gap so that the customers on the poorest performing feeders are brought to the level of service that those on the highest performing feeders experience.*" Xcel Energy is committed to improving the reliability of lower performing feeders. We have an existing program in place to address lower performing feeders through our Feeder Performance Improvement Program (FPIP), the details of which are reported annually each April 1 in our electric service quality filing.⁶

At this time, we believe that the metrics currently being tracked and reported on the interactive map will allow for us to focus those improvement efforts in an effective and equitable manner.

IV. RESPONSE TO ENVIRONMENTAL LAW & POLICY CENTER AND VOTE SOLAR

We provide our responses to some of Environmental Law & Policy Center/Vote Solar's Comments in the following section.

⁶ In the Matter of Northern States Power Company's Annual Report on Safety, Reliability, and Service Quality for 2021; and Petition for Approval of Electric Reliability Standards 2022, Docket No. E002/M-22-162, Attachment M.

A. Distribution System Planning

We agree with ELPC/VS that a systematic approach is fundamental to understanding whether and to what extent communities with higher levels of poverty and/or higher proportion of people of color face disparities in reliability, disconnections, or participation in low-income energy assistance and/or energy efficiency programs in Minnesota. We reiterate that establishing a three-year baseline of the existing metrics is essential for a systematic analysis.

We also agree that equity considerations should be part of a utility's planning, investment, and operating process and not a separate, siloed process. The Company's Equity Stakeholder Advisory Group established after the Commission's Order approving our most recent Integrated Resource Plan⁷ has begun discussing issues that are important to our communities with higher levels of poverty and higher proportions of people of color and will continue to discuss ways to incorporate principles of equity in broader utility decision-making.

The ELPC/VS recommend moving the locational reliability/equity metrics back into the Performance Based Ratemaking (PBR) docket. During the final stages of the PBR metric development and approval process in 2019, the Minnesota Department of Commerce (Department), the Suburban Rate Authority (SRA), and the Company all supported the shift from the PBR proceeding to service quality to have the ability to move these individual metrics forward outside of the larger PBR process. We continue to believe it is appropriate to hold the equity metrics within the service quality proceeding so it may be addressed individually, as it is now, versus managing within the larger PBR process.⁸ However, if the Commission chooses to re-open the PBR process after we submit the third year of reporting data and deems it appropriate to consider the equity metrics again within PBR, we are willing to have those discussions.

⁷ ORDER APPROVING PLAN WITH MODIFICATIONS AND ESTABLISHING REQUIREMENTS FOR FUTURE FILINGS, Docket No. E002/RP-19-368, April 15, 2022 (IRP Order).

⁸ In our January 6, 2023 Comments in this docket we stated the Commission had approved Staff's proposal on locational reliability and equity in reliability. Instead, the Commission approved a comment period on the proposed reporting elements. Docket No. E/002/M-19-261, January 28, 2020.

B. Reliability Equity Planning

Parties referred to Reliability Equity Planning Models in various stages of development and use throughout the country. We emphasize that the Company is reviewing opportunities to incorporate equity factors into our reliability investment prioritization.

DTE Energy's Global Prioritization Model is proprietary. Further, in the DTE Grid Plan, Section 2.2.2⁹: Actions, referenced by ELPC/VS, DTE states that they need to *"assess [DTE's] Global Prioritization Model (GPM) and determine how to adapt it to better support highly impacted communities as we invest going forward."*

The recently approved EJ/R3 Reliability metrics established in the Performance Metric Plan for Commonwealth Edison Company (ComEd) in IL, referenced by ELPC/VS, include SAIDI, SAIFI, CEMI-4, and CELID-12.

The Company currently provides the CEMI-6 and CELI-12 as normalized data based on the total number of electric premises in each census block group within the interactive map. The splash page of the interactive map states under both CEMI-6 and CELI-12 definitions: "The percentage was obtained by dividing the yearly average by the total number of Electric Premises served by Xcel Energy in each Census Block Group."

The Company could review the capability to additionally provide SAIDI and SAIFI in the interactive map. However, we believe the CEMI and CELI normalized metrics are more suited for customer-centric analysis. SAIDI and SAIFI are system level metrics that are most useful for evaluating performance in scales ranging between feeder level and company level. These metrics are also most effectively improved at the system levels where investments benefit the widest group of customers. SAIDI and SAIFI results for smaller groups like census block groups may appear inconsistent and therefore difficult to draw reliable conclusions as the calculation averages have a much smaller denominator than in typical use. For instance, two interruptions in a 12-month period for a neighborhood is not an uncommon occurrence but would result in a SAIFI of 2.0 which is nearly double the Xcel Energy system average. Significant numbers of occurrences along these lines are likely to distract from both the most effective system level reliability improvement opportunities and also the smaller groups of customers with greater reliability improvement needs. This is a primary reason SAIDI and SAIFI were not chosen for use in the interactive map but CEMI-6

⁹ DTE Exhibit A-23, Schedule MI, *DTE 2021 Distribution Grid Plan*

and CELI-12 were selected as the appropriate metrics. Alternatively, CEMI-6 and CELI-12 metrics focus attention to census block groups that are in greatest need of service improvements even if it is not a large enough group to show up in a system average type metric.

C. Recommended Reporting Data Via a Template

Parties provide further reporting recommendations via a template that they believe will be helpful in the distribution system planning process. It is the Company's interpretation that the Notice directed parties to comment on the interactive map we created following the Commission's Order in our service quality docket. It is unclear how or why including data in a template applies to the Notice.

ELPC/VS requests over 20 new fields be included via this template. However, it is not clear that most of these are required to effectively analyze equity. Census block group level listings of 'primary work center' and 'miles of line' for example, require significant data processing to accomplish but offer little insight into service performance or equity. We support robust reporting – indeed, we report on many of these items at the system level in dockets such as Service Quality and our Integrated Distribution Plan. However, reporting less relevant data and using different calculation methods of the same data may distract from the core goal of understanding and incorporating equity into the distribution system planning process. A consultant can help us determine the most relevant data and analysis to provide the Company and stakeholders with meaningful insight in this area.

Additionally, as we have recently discussed in Docket Nos. E999/CI-20-800 and E002/M-19-685, ensuring the physical and cyber security of our electricity grid is a shared responsibility and more critical now than ever, especially given Russia's invasion of Ukraine, continued cyber threats from China and other malicious actors, and the rise in domestic terrorism targeting critical infrastructure, including distribution infrastructure. Federal guidance and findings are anticipated in response to the current global security environment and current events. Releasing further information or data now could be inconsistent with these anticipated guidelines or directives, and once information is released, it cannot be retrieved. Concerns regarding cyber threats to our distribution system are neither exaggerated, nor fabricated. In March 2021, the U.S. Government Accountability Office (GAO) found that "distribution systems face significant cybersecurity risks," and "are becoming increasingly vulnerable to cyberattacks. Threat actors are growing more adept at exploiting these vulnerabilities to execute cyberattacks."¹⁰

¹⁰ GAO, DOE Needs to Ensure its Plans Fully Address Risks to Distribution Systems, op cit, p. 11.

CONCLUSION

We appreciate the opportunity to provide this additional information and clarifications as a response to Comments filed by City of Minneapolis and ELPC/VS. To provide insight into our performance, the Company is open to retaining a third-party consultant to perform an analysis on the data our interactive map provides. Additionally, consistent with the treatment of the Performance Based Rates docket, we believe it is important to establish a three-year baseline of the existing metrics within the map instead of adding more metrics, so that parties can determine if the data provides the information necessary to assess equity of service provided to our customers.

Dated: January 20, 2023

Northern States Power Company

CERTIFICATE OF SERVICE

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

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

xx by electronic filing.

**MPUC Docket Nos: E002/CI-17-401
E002/M-20-406**

Dated this 20th day of January 2023.

/s/

Crystal Syvertsen
Regulatory Administrator

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