BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger	Chair
Nancy Lange	Commissioner
Dan Lipschultz	Commissioner
John Tuma	Commissioner
Betsy Wergin	Commissioner

Bria Shea
Regulatory Manager
Xcel Energy
414 Nicollet Mall
Minneapolis, MN 55401

SERVICE DATE: October 23, 2015

DOCKET NO. G-002/M-15-406

In the Matter of the 2014 Annual Natural Gas Service Quality Report submitted by Northern States Power Company, a Minnesota Corporation (Xcel or the Company)

The above entitled matter has been considered by the Commission and the following disposition made:

Accepted the 2014 report.

The Commission agrees with and adopts the recommendations of the Department of Commerce, which are attached and hereby incorporated into the Order. This Order shall become effective immediately.

BY ORDER OF THE COMMISSION

Daniel P. Wolf
Executive Secretary

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MINNESOTA DEPARTMENT OF COMMERCE

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July 31, 2015

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

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. G002/M-15-406

Dear Mr. Wolf:

Attached are the *Comments* of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the following matter:

> 2014 *Annual Natural Gas Service Quality Report* submitted by Northern States Power Company, a Minnesota Corporation (Xcel or the Company).

The 2014 *Annual Natural Gas Service Quality Report* (2014 Report) was filed on May 1, 2015 by:

> Bria Shea
> Regulatory Manager
> 414 Nicollet Mall – 7th Floor
> Minneapolis, Minnesota 55401

Based on its review of Xcel's 2014 Report, the Department recommends that the Minnesota Public Utilities Commission (Commission) accept the Company's Report pending Xcel's response in *Reply Comments*.

The Department is available to answer any questions that the Commission may have.

Sincerely,

/s/ SAMIR OUANES
Public Utilities Rates Analyst

SO/lt
Attachment

MINNESOTA DEPARTMENT OF COMMERCE

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

COMMENTS OF THE MINNESOTA DEPARTMENT OF COMMERCE DIVISION OF ENERGY RESOURCES

DOCKET NO. G002/M-15-406

I. BACKGROUND

On April 16, 2009, the Minnesota Public Utilities Commission (Commission) opened an investigation into natural gas service-quality standards in Docket No. G999/CI-09-409. In its August 26, 2010 Order (09-409 *Order*), the Commission established uniform reporting requirements for all regulated Minnesota gas utilities. The 09-409 *Order* prescribed a list of indicators for which data for each calendar year are to be provided by each utility in a miscellaneous tariff filing to be made by the following May 1.

Northern States Power Company, a Minnesota corporation (Xcel or the Company) was allowed to report commingled gas and electric statistics for mislocates and for answer times from its utility call centers. The Company was allowed to report a partial year of data covering October 1, 2010 and thereafter for mislocates, gas lines damaged, summaries of major events reportable to the Minnesota Office of Pipeline Safety (MnOPS), and customer-service-related operations and maintenance expenses. For events reportable to MnOPS, all utilities were ordered to notify the Commission and the Minnesota Department of Commerce (Department) simultaneously with their notice to MnOPS.

In addition to the requirements in the 09-409 *Order*, the Commission's March 6, 2012 Order (11-360 *Order*) in Docket No. G002/M-11-360 *et. al,* directed all regulated Minnesota gas utilities to, in future annual reports:

- Include data on average speed-of-answering calls, in addition to reporting on the percentage of calls answered within 20 seconds or less;
- Explain, in their 2011 annual reports, whether the difference between the total percentage of meters (100%) and the percentage of meters read (by both the utility and customers) is equal to the percentage of estimated meter reads;

- Explain, beginning with their 2011 annual reports, the types of extension requests (such as requests for reconnection after disconnection for non-payment) they are including in their data on service extension request response times for both locations not previously served, as well as for locations that were previously served;

- Explain, beginning with their 2011 annual reports, the types of deposits (such as new deposits from new and reconnecting customers and the total number of deposits currently held) included in the reported number of "required customer deposits"; and

- Describe, beginning with their 2011 annual reports, the types of gas emergency calls included in their gas emergency response times, as well as the types of emergency calls included in their reports to the Minnesota Office of Pipeline Safety (MOPS). Provide an explanation of any difference between the reports provided to the Commission and to MOPS.

In the 11-360 *Order*, the Commission also specifically required Xcel to, beginning in its 2011 report, explain how its gas-related call center complaints correspond with the complaint categories contained in Minn. Rules, part 7826.2000.

Further, the Commission's November 30, 2010 *Order* in Docket No. E,G002/M-09-224 and G002/CI-08-871 included the following order point:

> Direct Xcel to file the following information with its annual electric service quality reports filed pursuant to Minn. Rules, Part 7826.0500 and its annual gas service quality reports established in Docket No. G999/CI-09-409 starting in 2013:
>
> - Volume of Investigate and Remediate field orders;
> - Volume of Investigate and Refer field orders;
> - Volume of Remediate upon Referral field orders;
> - Average Response Time for each of the above categories by month and year;
> - Minimum days, maximum days, and standard deviations for each category; and
> - Volume of excluded field orders.

The Commission's April 7, 2014 *Order* in Docket No. E,G002/M-13-371 required Xcel to provide complete and accurate meter reading data with multiple reads excluded in future reports.

On May 1, 2015, Xcel filed its 2014 *Natural Gas Service Quality Performance Report* (2014 Report). The Department provides its analysis of the 2014 Report below.

II. DEPARTMENT ANALYSIS

Each year, the Department analyzes the information provided in the Report in the context of past reports. Overall, the Department identified no major concerns regarding Xcel's 2014 Report. However, as discussed below in sections II.A, II.B and II.K below, the Department requests that in *Reply Comments* Xcel:

(1) explain and reconcile the difference between the Company's and the Department's calculation of the percent of calls being answered within 20 seconds and correct as needed its calculation of the call center response time for the years 2010 through 2014,

(2) discuss the reasons for the significant increase in the number of meters not read for periods of six to 12 months in 2014, and

(3) discuss the reasons for the significant increase in duration of service interruptions in 2014.

The Department provides further detail on each reporting metric by discussing each separately below.

A. CALL CENTER RESPONSE TIME

Xcel reported the percentage of calls to call centers answered within 20 seconds in Attachment A of its Report, as required by the 09-409 *Order*. As the 09-409 *Order* permitted, the information reflects both natural gas and electric customer calls placed to the call centers.

As shown in Table 1 below, Xcel was able to answer 80 percent, or more, of calls within 20 seconds, with an average of 90 percent of calls being answered within 20 seconds.

Table 1: Call Center Response Time

Year	12 Mo. Avg.	Avg. Speed (Seconds)	# of calls
2010	83.0%	n/a	3,833,374
2011	86.2%	20	3,783,176
2012	89.4%	19	3,682,314
2013	89.0%	26	4,009,067
2014[1]	90.0%	20	3,758,280

[1] Source: Attachment A of the instant filing, lines 26, 31 and 22.

The Department notes that its calculation of the Company's 90 percent average using Xcel's formula provided under Note 26 (page 2 of Attachment A) yields a slightly smaller percentage, 89.45 percent.

The Department requests that Xcel explain and reconcile this difference and correct as needed its calculation of the call center response time in terms of the percentage of calls answered within 20 seconds for the years 2010 through 2014.

The Department acknowledges that Xcel has fulfilled the requirements of the 09-409 and 11-360 *Orders*.

B. METER-READING PERFORMANCE

Xcel reported the following metrics for meter-reading performance in Attachment B of its Report, and included complete and accurate meter reading data as required by the Commission's April 7, 2014 *Order* in Docket No. E,G002/M-13-371:[2]

A. the number and percentage of customer meters read by Company personnel;
B. the number and percentage of customer meters self-read by customers;
C. the number and percentage of customer meters that have not been read by Company personnel for periods of six to 12 months and for periods of longer than 12 months, and an explanation as to why they have not been read; and
D. data on Company monthly meter-reading staffing levels, by work center or geographical area.

Xcel reported that an annual average of 97.39 percent of customer meters were read by utility personnel and 0.0011 percent were read by the customer in 2014.[3]

Xcel provided the number of meters unread in 2014 for 6 to 12 months and for more than 12 months for its Residential, Commercial, Industrial, and Other customer classes. "No Reading Returned" was the most common reason across all customer classes for failure of meters to be read.

Table 2 summarizes the number of meters not read by utility personnel for more than 12 months according to Xcel's current and past annual reports.

[2] Xcel's meter reading performance reporting includes both electric and natural gas meters.
[3] Department's calculations based on data provided in Tables A and B, Attachment B, page 1 of 7 of the 2014 Report.

Table 2: Meters Not Read for Longer than 12 Months

Year	Residential	Commercial	Industrial	Other	Total
2010	1,149	366	263	71	1,849
2011	637	403	181	94	1,315
2012	661	450	112	89	1,312
2013	602	335	131	64	1,132
2014[4]	620	304	92	68	1,084

The Department appreciates Xcel's continued efforts in reducing the number of meters not read for longer than 12 months.

Table 3 summarizes the number of meters not read by utility personnel for periods of six to 12 months according to Xcel's current and past annual reports.

Table 3: Meters Not Read for Periods of 6 to 12 Months

Year	Residential	Commercial	Industrial	Other	Total
2010	3,506	1,076	338	100	5,020
2011	2,346	967	244	183	3,740
2012	3,967	1,232	248	106	5,553
2013	2,600	822	177	79	3,678
2014[5]	5,237	1,178	260	123	6,798

The number of meters not read for periods of six to 12 months increased substantially from 3,678 in 2013 to 6,798 in 2014. The Department requests that Xcel provide a discussion in *Reply Comments* regarding the reasons for the significant increase in the number of meters not read for periods of six to 12 months in 2014.

Xcel provided its monthly staffing levels for its four work centers and for meter readers working in western Minnesota, North Dakota and South Dakota.[6] The Company averaged a total of 15 meter reading staff throughout 2014, compared to 19.8 in 2013.

The Department acknowledges that Xcel has fulfilled the requirements of the 09-409, 11-360, and 13-371 *Orders*.

C. INVOLUNTARY DISCONNECTIONS

The 09-409 *Order* required the Company to provide the involuntary disconnections data that it reports under Minn. Stat. § 216B.091 and § 216B.096 (Cold Weather Rule reports).[7]

[4] Source: Table C-2, Attachment B, pp. 5-7 of the 2014 Report.
[5] Source: Table C-1, Attachment B, pp. 2-4 of the 2014 Report.
[6] Source: page 3 of Xcel's 2014 Report.
[7] Docket Nos. E,G999/PR-10-02, E,G999/PR-11-02, E,G999/PR-12-02, E,G999/PR-13-02 and E,G999/PR-14-02.

Table 4 summarizes residential customer disconnection statistics reported by Xcel:

Table 4: Residential Customer Involuntary Disconnect Information

Year	Customers Receiving Disconnect Notice	Customers Seeking CWR Protection	Customers Granted CWR Protection	% Granted	Customers Disconnected Involuntarily	Customers Restored within 24 Hours
2010	1,218,073	173,440	173,440	100%	29,592	12,121
2011	1,282,576	188,091	188,271	100%	27,120	11,273
2012	1,207,842	121,393	121,393	100%	27,132	21,780
2013	1,217,049	126,477	126,477	100%	23,493	20,142
2014[8]	1,168,975	105,561	105,561	100%	25,532	21,860

The Department acknowledges that Xcel has fulfilled the requirements of the 09-409 *Order*.

D. SERVICE EXTENSION REQUEST RESPONSE TIMES

Xcel stated in its May 18, 2009 *Comments* in Docket No. G999/CI-09-409 that nearly all requests to connect natural gas service at a location previously served are from customers who have had their meter locked due to nonpayment issues, as it is otherwise uncommon to disconnect service between tenants. Therefore the Company included all reconnection statistics, including service upgrades involving disconnection and reconnections to a formerly vacant address, in its reporting of requests for new service.

As shown in Table 5, Xcel reported that the Company extended service to 2,158 new residential locations in 2014, compared to 1,582 in 2013, with an average completion time of 1.1 days.[9] The total number of extensions to commercial locations was 223, compared to 130 in 2013, with an average completion time of 0.9 days.[10] Xcel's 2014 residential and commercial service extension performance was on par with the 0.8 and 0.7 days, respectively, achieved in 2013.

Table 5: Service Extension Requests

	Residential		Commercial	
Year	# of Installations	Avg. # of Days to Complete	# of Installations	Avg. # of Days to Complete
2010	2,210	6.00	16	9.00
2011	1,625	3.92	140	2.83
2012	1,388	3.00	154	3.20
2013	1,582	0.80	130	0.70
2014	2,158	1.10	223	0.90

[8] Department's calculations based on monthly data provided in Attachment C of the 2014 Report.
[9] Source: Attachment D of Xcel's 2014 Report.
[10] Source: Attachment D of Xcel's 2014 Report.

The Department acknowledges that Xcel has fulfilled the requirements of the 09-49 and 11-360 *Orders*.

E. CUSTOMER DEPOSITS

The reporting metric for customer deposits is the number of customers required to make a deposit as a condition of receiving service. Xcel reported a total of 606 such accounts for both its natural gas and electric operations in 2014.[11]

Table 6: Customer Deposits

Year	Deposits	% Change
2010	657	n/a
2011	665	1.22%
2012	622	-6.47%
2013	652	4.82%
2014	606	-7.06%

Per the 11-360 *Order*, the utilities were required to explain the types of deposits included in the reported number of "required customer deposits." Xcel stated that it requires deposits from residential customers that have filed for bankruptcy. The Company noted that it requests these deposits upon notification of the bankruptcy and not as a condition for reconnection of service. Xcel further stated that once customers file for bankruptcy, their service is begun anew and the deposit amount is included in their first bills.

The Department acknowledges that Xcel has fulfilled the requirements of the 09-409 and 11-360 *Orders*.

F. DETAILED INFORMATION ABOUT CUSTOMER COMPLAINTS

The metrics addressing customer complaints include:

A. the number of complaints received;
B. the number and percentage of complaints alleging billing errors, inaccurate metering, wrongful disconnection, high bills, inadequate service, and the number involving service-extension intervals, service-restoration intervals, and any other identifiable subject matter involved in five percent or more of customer complaints;
C. the number and percentage of complaints resolved upon initial inquiry, within ten days, and longer than ten days;

[11] Source: page 4 of Xcel's 2014 Report.

D. the number and percentage of all complaints resolved by taking any of the following actions:
   a. taking the action the customer requested;
   b. taking an action the customer and the utility agree is an acceptable compromise;
   c. providing the customer with information that demonstrates that the situation complained of is not reasonably within the control of the utility; or
   d. refusing to take the action the customer requested; and

E. the number of complaints forwarded to the utility by the Commission's Consumer Affairs Office for further investigation and action.

As shown in Table 7, Xcel reported that 770 electric and natural gas complaints were handled by the Company's Customer Advocate Group (CAG) in 2014, 115 of which were forwarded by the Consumer Affairs Office (CAO).[12] Data provided by the Company showed that 16.8 percent of complaints handled by Xcel's Customer Advocate Group were resolved upon inquiry. The most frequent complaint category was "inadequate service." Data provided by Xcel showed that 51.3 percent of complaints in 2014 were resolved by taking the action the customer requested, compared to 38.3 percent in 2013.

Table 7: Customer Complaints Handled by CAG

Year	# Handled by CAG	# Forwarded by CAO	% Resolved on Initial Inquiry	% Resolved by Taking Customer Action	Top Complaint Category
2010	693	124	17%	29.1%	Inadequate Service
2011	627	127	13.2%	28.2%	Inadequate Service
2012	613	101	18.6%	27.2%	Inadequate Service
2013	745	94	18.9%	38.3%	Inadequate Service
2014	770	115	16.8%	51.3%	Inadequate Service

As shown in Table 8, Xcel also received 796,982 complaints in 2014 that were handled upon initial inquiry in the Company's call centers.[13] Approximately 96 percent of these complaints were resolved by taking the action the customer requested. The complaint category with the largest volume of complaints for all customers was "billing errors" with "wrongful disconnect" and "inadequate service" additionally of significant concern to residential customers.

[12] Source: Attachment E of Xcel's 2014 Report.
[13] Department's calculation based on monthly data provided in Attachment E of the 2014 Report

Table 8: Customer Complaints Handled by Xcel's Call Centers

Year	# Handled by Xcel's Call Centers	% Resolved by Taking Customer Action	Top Complaint Category
2011	877,097	95	Billing Errors
2012	806,506	96	Billing Errors
2013	802,754	96	Billing Errors
2014	796,982	96	Billing Errors

Per the 11-360 *Order*, Xcel provided a chart that aligned its customer complaint categories with the ones contained in Minn. Rules, part 7826.2000.[14] The majority of Xcel's complaint categories fell within the "Billing Error" and "Inadequate Service" categories in the Rules.

The Department acknowledges that Xcel has fulfilled the requirements of the 09-409 and 11-360 *Orders*.

G. EMERGENCY CALLS SPEED OF ANSWER

The Company reported its average speed of answering emergency line calls for natural gas emergencies by month and year for all its possible sources, including the general customer service line, Business Line, Electric Outage line, and Gas Emergency Line. Xcel also reported the same information for calls directed exclusively to the dedicated Gas Emergency Line. This information is summarized in Table 9.

Table 9: Gas Emergency Calls

Year	# of Gas Emergency Calls	Average Response Time (seconds)	# of Gas Emergency Line Calls	Average Response Time (seconds)
2011	31,232	7	16,795	8
2012	26,046	8	15,013	8
2013	27,669	17	14,431	10
2014	25,426	8	15,754	8

The 2014 annual average answer time for all gas emergency calls was 8 seconds for 25,426 calls; the average for the dedicated gas emergency line only was 8 seconds for 15,754 calls.[15]

The Department acknowledges that Xcel has fulfilled the requirements of the 09-409 *Order*.

[14] Attachment E1 of Xcel's 2014 Report.
[15] Source: Attachment G of Xcel's 2014 Report.

H. EMERGENCY GAS RESPONSE TIMES

The Company also reports the response time associated with emergencies requiring a physical presence at the site of the emergency. This metric is the length of time from the initial notification of an emergency to the point that qualified emergency response personnel arrived at the location of the incident. Xcel reported emergency response times by job code and total calls, by calls responded to within one hour or less, and calls responded to in more than one hour. Xcel also provided the average number of minutes necessary for response to an emergency. The Company's emergency gas response time data are summarized in Table 10.

Table 10: Gas Emergency Response Times

Year	# of Gas Emergency Calls	Average Response Time (minutes)	% of Calls Answered in an Hour or Less
2010	18,557	51.77	76%
2011	16,417	44.88	80%
2012	1,728	40.30	84%
2013	13,801	41.73	83%
2014	14,548	40	85%

In 2014, there were 14,548 emergency calls to which a response was required, with an average response time of 40 minutes, and 85 percent of calls were responded to within one hour.[16]

In the 11-360 *Order*, all gas utilities were required to describe the types of gas emergency calls included in their gas emergency response times, as well as the types of emergency calls included in their reports to MnOPS. The utilities were also required to provide an explanation of any difference between the reports provided to the Commission and those provided to MnOPS. Xcel has included the MnOPS Emergency Response Reporting Forms for 2014 in its Report.[17] In 2014, there were 11,020 calls that were reportable to MnOPS of the 14,548 total calls that required a response.[18]

The Department acknowledges that Xcel has fulfilled the requirements of the 09-409 and the 11-360 *Orders*.

I. MISLOCATE RATE

The mislocate rate refers to the number of times that a gas line is damaged due to a line being mismarked or unmarked. The required reporting metric is the total number of

[16] Source: page 1 of Attachment I of Xcel's 2014 Report.
[17] Attachment H of Xcel's 2014 Report.
[18] Source: page 1 of Attachment H of Xcel's 2014 Report.

mislocates. The Company also provided the number of locate tickets and the number of mislocates per 1,000 locate tickets. Xcel's mislocate data are summarized in Table 11.

Table 11: Mislocates

Year	# of Mislocates	# of Locate Tickets	Mislocates per 1,000 Tickets
2012	54	160,832	0.34
2013	57	155,531	0.37
2014	43	167,578	0.26

For 2014, Xcel reported 43 mislocates out of a total of 167,578 locate tickets, a rate of 0.26 mislocates per 1,000 tickets.[19] This is a substantial decrease over the data from 2013, where Xcel reported 57 mislocates out of a total of 155,531 locate tickets, or a rate of 0.37 per 1,000 locate tickets.

The Department acknowledges that Xcel has fulfilled the requirements of the 09-409 *Order*.

J. GAS SYSTEM DAMAGES

The metric concerning gas system damage indicates the number of incidents caused by Company employees and contractors, or other sources. Xcel's gas system damage data are summarized in Table 12.

Table 12: Damaged Gas Lines

Year	Damage by Xcel	Damage by Others	Total	Miles of Main	Damage/100 Main Miles
2011	27	308	335	8,785	3.81
2012	81	254	335	8,924	3.75
2013	87	253	340	8,942	3.80
2014	77	238	315	8,942	3.52

In 2014, Xcel reported 315 total gas system damages, of which 77 were due to Xcel employees or its contractors, and 238 were due to other causes. In 2013, there were 340 gas system damages of which 87 incidents were due to actions of Company employees or its contractors, and 253 incidents were from all other causes.[20]

The Company reported a rate of 0.86 damage incidents caused by Xcel or contractors per 100 miles of main and 2.66 damage incidents from other causes per 100 miles of main in 2014. This is lower than the rate of 0.97 damage incidents caused by Xcel employees and contractors per 100 miles of main and 2.83 incidents per 100 miles from other causes in

[19] Attachment J of Xcel's 2014 Report.
[20] Attachment K of Xcel's 2014 Report.

2013. The total rate for 2014 was 3.52 incidents per 100 miles, a decrease of 0.28 incidents per 100 miles from 2013.

The Department acknowledges that Xcel has fulfilled the requirements of the 09-409 *Order*.

K. NATURAL GAS SERVICE INTERRUPTIONS

The reporting metrics for natural gas service interruptions are the number of firm customers that experience an unplanned service interruption and the average duration of the unplanned service disruptions. Unplanned service interruptions are those due to Xcel employees and contractors, or other unplanned causes. 2014 marks the fourth year that the Company had data available for the entire calendar year. Xcel's gas service interruptions data are summarized in Table 13.

Table 13: Gas Service Interruption

Year	Number of Homes Affected	Number of Incidents Caused by Xcel	Average Duration of Outages Caused by Xcel (hours:minutes)	Number of Incidents Caused by Others	Average Duration of Outages Caused by Others (hours:minutes)
2011	2,130	31	5:39	249	3:50
2012	473	25	2:30	254	1:46
2013	621	26	1:43	238	2:00
2014	1,023	18	2:29	248	2:22

A total of 1,023 customers were affected by 266 gas service interruptions in 2014.[21] Eighteen outages were caused by Xcel employees and contractors, affecting 71 homes, while 248 outages affecting 952 homes occurred due to other causes. The average duration of gas-service interruptions in 2014 was 2 hours 29 minutes for outages associated with Xcel employees and contractors, compared to 1 hour 43 minutes in 2013, and 2 hours 22 minutes for the outages due to other causes, compared to 2 hours in 2013.

The Department requests that Xcel provide a discussion in *Reply Comments* regarding the reasons for the significant increase in duration of service interruptions in 2014.

In 2013, there were 621 homes affected through 264 incidents. The proportion of those incidents caused by Xcel decreased from 26 to 18, and the number of incidents from other causes increased from 238 to 248. More homes were affected in 2014 than in 2013. Interruption statistics for 2012 through 2014 reflect an improvement over 2011, which saw 280 incidents affect over 2,000 homes.

[21] Attachment L of Xcel's 2014 Report.

The Department notes that in 2014 there were five major incidents that affected more than 50 customers.[22] Additionally, service interruptions were most prevalent in July, August, and September, with the winter months not experiencing significant service interruptions, likely due to the prevalence of construction activities in the summer months.

The Department acknowledges that Xcel has fulfilled the requirements of the 09-409 *Order*.

L. MnOPS SUMMARIES

The Company is required to summarize major events that require a report being made to the MnOPS. These summaries include the ten items that the MnOPS requires in its incident reports. They are:

- the location;
- when the incident occurred;
- how many customers were affected;
- how the company was made aware of the incident;
- the root cause of the incident;
- the actions taken to fix the problem;
- what actions were taken to contact customers;
- any public relations or media issues;
- whether the customer or the company relighted; and
- the longest any customer was without gas service during the incident.

Xcel reported 32 such major events during 2014.[23] The Company provided a table of data concerning major incidents, which includes all ten items required by MOPS.

The Department acknowledges that Xcel has fulfilled the requirements of the 09-409 *Order*.

M. CUSTOMER-SERVICE-RELATED EXPENSES

The customer-service-related expenses reporting metric is the total operation and maintenance (O&M) expenses incurred related to customer service. The report included expenses for operations in Xcel's Minnesota jurisdiction, as well as the total for Northern States Power Company (which includes North Dakota expenses). Table 14 below summarizes Xcel's reported customer-service expenses for its Minnesota jurisdiction.[24]

[22] Attachment M of Xcel's 2014 Report.
[23] Source: Attachment M of Xcel's 2014 Report.
[24] Source: Attachment N of Xcel's 2014 Report.

Table 14: Customer-Service Expenses: Minnesota Jurisdiction

Year	2010	2011	2012	2013	2014
FERC 901 and 903	$5,612,215	$5,927,900	$5,896,206	$5,799,728	$5,617,750
Associated Payroll Taxes& Benefits	$396,149	$391,843	$436,123	$431,478	$374,554
Total	$6,008,364	$6,319,743	$6,332,329	$6,231,206	$5,992,304

The Department acknowledges that Xcel has fulfilled the requirements of the 09-409 *Order*.

N. COMMISSION ORDER IN THE MATTER OF AN INVESTIGATION INTO XCEL'S INACCURATE GAS METERS, RECALCULATION OF BILLS, AND RELATED ISSUES (DOCKET G002/CI-08-871)

As indicated above, Xcel is required to provide certain data regarding meter repair field orders, which has traditionally been provided for both electric and gas service in the annual Electric Service Quality Dockets; 2014 marks the third year that Xcel provided Meter Malfunction data in the Natural Gas Service Quality Docket. Xcel's meter equipment malfunction data are summarized in Table 15.

Table 15: Meter Equipment Malfunction

Year	# of Orders for Gas Meter Equipment Malfunctions	Average Days to Resolve	# of Exclusions for Meter Access Exclusions
2012	2,891	2.97	365
2013	3,286	3.07	608
2014	3,376	3.43	613

In 2013, there were 3,286 orders for gas meter equipment malfunctions taking an average of 3.07 days to resolve, along with 608 exclusions for meter access issues. In 2014, there were 3,376 orders taking an average of 3.43 days to resolve, with 613 meter access exclusions.[25]

III. DEPARTMENT RECOMMENDATIONS

Based on its review of Xcel's 2014 *Annual Natural Gas Service Quality Report*, the Department recommends that the Commission accept the 2014 Report.

In addition, the Department requests that in *Reply Comments,* Xcel:

[25] Source: Attachment O of Xcel's 2014 Report.

(1) explain and reconcile the difference between the Company's and the Department's calculation of the percent of calls being answered within 20 seconds and correct as needed its calculation of the call center response time for the years 2010 through 2014,

(2) discuss the reasons for the significant increase in the number of meters not read for periods of six to 12 months in 2014, and

(3) discuss the reasons for the significant increase in duration of service interruptions in 2014.

/lt

MINNESOTA DEPARTMENT OF COMMERCE

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September 17, 2015

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

RE: Response Comments of the Minnesota Department of Commerce,
Division of Energy Resources
Docket No. G002/M-15-406

Dear Mr. Wolf:

On May 1, 2015, Northern States Power Company, d/b/a Xcel Energy (Xcel or the Company) filed its *Natural Gas Annual Service Quality Performance Report* (Report).

In its July 31, 2015 comments, the Division of Energy Resources of the Minnesota Department of Commerce (Department) recommended that the Minnesota Public Utilities Commission (Commission) accept the Report pending the submission of additional information.

On August 10, 2015, Xcel completed the record as requested by the Department. In particular, the Company committed to correct the footnote describing Xcel's calculation of the call center response time in its future annual electric and natural gas service quality reports.

Based on its review, the Department continues to recommend that the Commission accept the Report.

The Department is available to answer any questions that the Commission may have.

Sincerely,

/s/ SAMIR OUANES
Public Utilities Rates Analyst

SO/ja