

October 6, 2020

Mr. Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 280
St. Paul, Minnesota 55101-2147

RE: Response Comments of the Minnesota Department of Commerce, Division of Energy Resources
Docket No. G-002/M-20-406

Dear Mr. Seuffert:

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

2019 Annual Service Quality Report submitted by Northern States Power Company, a Minnesota Corporation.

The Department reviewed the additional information that Northern States Power Company (Xcel, the Company) provided in its reply comments. We appreciate the additional information and now recommend that the Commission **accept** the Company's 2019 service quality annual report and require Xcel to provide additional information in its 2020 report.

We also summarize the parties reply comments regarding the questions included in the Commission's April 20, 2020 Notice of Comments in this proceeding regarding customer service, locational reliability and equity. We provide a procedural recommendation for those topics as well.

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

Sincerely,

/s/ JOHN KUNDERT
Financial Analyst

JK/ar
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. E-002/M-20-406

I. INTRODUCTION

On April 2, 2020 Northern States Power Company *d/b/a* Xcel Energy (Xcel or the Company) filed its annual electric service quality report (Report) for 2019 with the Minnesota Public Utilities Commission (Commission). Annual service quality reports provide the Commission with an opportunity to review the utility's service quality data and determine whether the utility is meeting the relevant service quality standards.

On April 20, 2020 the Commission issued a Notice of Comment Period (Notice) in this docket. The Notice listed five questions addressed to all of Minnesota's rate-regulated investor owned utilities. The Notice also included four additional questions specific to Xcel.

Xcel filed comments responding to the Notice on August 17, 2020. The Minnesota Department of Commerce, Division of Energy Resources (Department), the Suburban Rate Authority (SRA), the City of Minneapolis (Minneapolis), the Environmental Law and Policy Center and Vote Solar (ELPO/VS) filed comments on August 19, 2020. The Department requested the Xcel provide additional information in its reply comments.

On September 2, 2020 Xcel, Fresh Energy (FE), the SRA and the Department filed reply comments. The Department recommended that the Commission:

- 1) reject Xcel's proposal to use a five-year average of IEEE information as the basis of its reliability goals and
- 2) continue to explore the issues related to locational reliability and equity over the coming months.

Xcel's reply comments were separated into two categories. The Company responded to the Department's request for additional information relative to the service quality component of its 2019 Report. Xcel provided its response to the locational reliability and service quality and other equity information in a second section of the Report.

Xcel filed its reply comments on September 2, 2020 and provided its responses to the Department's requests for additional information.

The Company also filed an errata on September 18, 2020 correcting errors regarding meter reading information contained in the 2019 Report.

II. DEPARTMENT ANALYSIS

The Department appreciates the additional information Xcel provided. We review Xcel's responses to our questions regarding the traditional topics covered in the Annual Service Quality report and then respond to the different parties' comments on locational reliability and equity.

A. *PAYMENTS FOR QUALIFYING PROPERTY DAMAGE CLAIMS*

The Department requested the following information in our Comments:

- the circumstances surrounding the claims for qualifying property damage,
- whether Xcel has taken any action to prevent a reoccurrence of such circumstances,
- whether the Company expects to pay out larger claims with more frequency in future years, and
- any other information the Company believes is relevant.

Xcel provided details as to the basis of the increase in claims paid in 2019 and explained that a large percentage of the \$1,203,379 in claims in 2019 was the result of having resolved two legal proceedings that were initiated in 2015 and 2016. The Company noted that the reporting construct it currently uses, in which it reports all claims paid in the calendar year as opposed to claims paid for incidents that occurred in that calendar year, can lead to a large amount of variability in the amounts of claims paid as was the example in 2019.

The Department appreciates the additional information the Company provided and concludes that Xcel's discussion is adequate for the purposes of this proceeding.

B. *SOUTHEAST WORK CENTER – HIRING OF NEW EMPLOYEES*

The Department requested an update on Xcel's progress in hiring new employees for its Southeast Work Center.

Xcel noted that it had not been successful in hiring additional staff for its Southeast Work Center to date in response to the Department's request that the Company provide an update on those efforts. Xcel also noted that it is actively recruiting for four additional line-workers in the Southeast region.

We appreciate the additional information. Given Xcel's ongoing staffing and reliability issues in the Southeast region, the Department recommends that the Commission continue to require Xcel to provide quarterly reports on its efforts to improve outcomes in this region.

C. PROPOSED 2020 RELIABILITY STANDARDS

The Department requested justification for Xcel's proposed decreases in service quality reflected in Xcel's proposed goals for the following work centers:

- Metro East SAIDI goal increased from 89.78 to 89.95 minutes;
- Metro East CAIDI goal increased from 103.94 to 106.91 minutes;
- Metro West CAIDI goal increased from 100.37 to 100.55 minutes;
- Northwest SAIDI goal increased from 85.86 to 87.11 minutes; and
- Northwest CAIDI goal increased from 113.01 to 115.72 minutes.

The Company provided additional information regarding the development of its proposed 2020 reliability standards for the Metro West, Metro East and Northwest work centers. Specifically Xcel noted that the calculation of the 2020 standards relies on a five year average and that if the year introduced into the calculation experienced worse-than-average reliability relative to the year that was dropped from the five-year average, the proposed 2020 reliability standards would become less stringent.

The Department confirmed that the calculation resulted in these changes, except for the SAIDI and SAIFI reliability standards for the Southeast work center, which the Commission froze in 2017 and the CAIDI standard in 2018. The Department appreciates the Company's explanation.

If the Commission wishes to see a steady improvement in the metrics noted above, the Commission may wish to freeze the metrics at the levels set in 2019 and not allow the numbers to increase at this time. Alternatively, the Commission may wish to require Xcel to report in its next service quality filing on improvements that the Company has made to its system, particularly in the Metro East and Northwest work centers.

D. MAIFI HISTORICAL PERSPECTIVE

The Department asked Xcel for an explanation as to why the MAIFI results for the Northwest and Southwest work centers have shown so little improvement over the past decade in our Comments.

The Company explained that it is in the process of upgrading its distribution network such that it can track MAIFI over its entire distribution system, which the Company estimates will occur in 2024. Until that process is completed, historical MAIFI information will be of limited value. Or as the Company noted in its response, "At this time the true value of MAIFI experienced by customers is unknown."¹

The Department concludes that Xcel's discussion is adequate support for the purposes of this proceeding.

¹ Xcel Reply Comments at page 6.

E. RESIDENTIAL CUSTOMER INVOLUNTARY DISCONNECTIONS – PAYMENT PLANS

We requested additional information on the number of customers entering payment plans in 2019 compared to 2018.

Xcel explained that it had worked on improving its existing payment plan negotiation process in 2018 and 2019 with help from the Commission's Consumer Affairs Office (CAO). The Company identified the increase in the number of payment arrangements in 2019 to this process improvement.

The Department concludes that Xcel's discussion is adequate support for the purposes of this proceeding.

F. CALL CENTER RESPONSE TIMES²

The Department requested an explanation of the 5 second increase (22 to 27 seconds) in the average answer speed for agent-only calls in 2019. We also noted in our Comments that Xcel's call response times were significantly longer in April, September and October of 2019.

The Company stated that the longer Call Center response times in April were directly related to the expiration of the cold weather rule (CWR) on April 15. Xcel noted that its credit agents received a record number of residential calls on Monday April 15 (10,377) and that calls levels remained high during that entire week. As to the longer Call Center response times in September and October, those were the result of a large unplanned customer resource system (CRS) outage that occurred over a four-day period from September 26th through September 30th. This CRS failure also affected customers' ability to conduct self-service transactions on the Company's website and interactive voice response (IVR) platforms.

The Department recognizes and appreciates the Company's efforts addressing the annual spike in credit-related calls prompted by the expiration of the CWR. The Company's CRS four-day unplanned outage is concerning, however. Xcel's Minnesota customers deserve a better level of service than the one provided in September and October 2019. The Department recommends that the Commission require Xcel to provide additional information in its 2020 Annual Service Quality Report that discusses the Company's efforts to improve the reliability of its Customer Resource System.

² The Company's discussion was similar to that presented in its 2019 Gas Service Quality Annual Report, Docket No. G002/M-20-460.

G. USING IEEE BENCHMARKING DATA FOR SETTING RELIABILITY STANDARDS

In our comments the Department recommended that the Commission:

- reject Xcel's proposed transition from a rolling five-year average to set reliability standards to benchmarking to the IEEE Reliability Working Group.
- Require Xcel to provide historical company-specific information and the IEEE benchmarking analysis.
- Require Xcel to develop a comparative analysis using IEEE benchmarking information on an annual basis.
- Set Xcel's IEEE reliability goals as being in the first quartile.

Xcel noted that it developed its proposal to transition to a rolling five-year average to set reliability standards to benchmarking to the IEEE Reliability Working Group. Xcel also noted that the Commission also identified the second quartile as appropriate in its Order dated January 28, 2020 in Docket No. E002/M-19-261. That said, the Company states its willingness to develop a comparative analysis using IEEE benchmarking data and to provide this analysis annually in a supplemental filing to the Annual Service Quality Report.³ Xcel noted, however, that procedurally it would be preferable to require such a submission 30 days after IEEE posted its benchmarking study in its website.

The Department appreciates Xcel's flexibility in this area. The Department agrees that extending the submission of Xcel's report to 30 days after IEEE posted its benchmarking study on its website is reasonable.

H. VARIANCE FROM MINN. R. 7826.05, SUBPART 1.G

The Department recommended approval of the Company's request to vary Minn. R. 7826.0500, Subpart 1.G if Xcel maintains copies of all individual reports provided to the Commission's Consumer Affairs Office in our Comments. The Company stated that it will continue to retain copies of individual report of major service interruptions sent to the CAO over the course of the year. Xcel also referenced Attachment D to the filing, which it claimed addressed two Commission Orders that addressed similar topics. The Company concluded by asking that it be allowed to supplement the existing information in Attachment D rather than being held responsible for a new Annual Reporting requirement.

The Department agrees with Xcel on this issue and suggests that the Commission grant the variance for one year. If the information Xcel provides in its 2020 Electric Service Quality Annual Report is insufficient in this regard, the Commission can simply not extend the variance and identify additional information that Xcel will be required to provide.

³ Reply Comments at page 10.

II. Locational Reliability and Service Quality and Other Equity Information

On September 2, 2020 Fresh Energy (FE) and the Suburban Rate Authority (SRA), in addition to Xcel Energy and the Department filed reply comments in this proceeding. The Department summarizes these recommendations for the Commission's consideration.

FE provided the following recommendations/modifications to the Commission staff's proposal for locational reliability reporting:

1. Modify Part 2 as follows:
 - a. Information should be downloadable as in a .csv file format;
 - b. Information should be available by census tract or zip code;
 - c. SAIDI, SAIFI, CAIDI, normalized (IEEE) 1366 Standard) and with Major Event Days should compare current year SAIDI, SAIFI, and CAIDI to prior-year data starting in 2021, adding one year of prior reporting history until reaching a 5-year comparison in 2024.
 - d. Number of outages, total customer outages, and total customer-minutes-out for the following situations;
 - i. Involuntary disconnections (absolute number and as a percentage of customers)
 - ii. Customer counts participating in energy assistance programs (absolute number and as a percentage of customers)
 - iii. Customer accounts participating in utility energy efficiency programs (absolute number and as a percentage of customers)
2. Modify Part 3 as follows:
 - a. The map discussed in this section shall:
 - i. Be updated at least annually as part of the Service Quality Reports;
 - ii. Not require creation of an account to view or access;
 - iii. Have layers for different data sets, including reliability performance and economic demographic data which viewers can select and de-select;
 - iv. Show lines for feeder locations, and indicate substation locations;
 - v. Enable popup boxes that show viewers key equity and locational reliability data for any specific point on the map; and
 - vi. Enable the "attribute table" function to allow viewers to see and download underlying data for a specific view window.

Fresh Energy also recommended that the Commission direct parties to continue discussions about a potential simplified locational reliability scoring method and to present a proposal for Commission consideration during the review of Xcel's 2020 Annual Electric Service Quality Report.

The SRA listed four recommendations in its reply comments:

1. Metrics that where needed, expand on methods of informing and [providing] interactive communications with customers during and following outages, particularly in areas identified as Equity or “Energy Poverty” areas.
2. Metrics that identify smaller, e.g. neighborhood or feeder or socio-economic, areas of sub-standard performance in reliability and communication with customers. The SRA believes that even zip code sub-areas hide areas that should be identified for improvement....
3. A metric that will combine relevant reliability measures relating to overhead, underground, and mixed use of the same in feeder or other relevant area. ...
4. Continued or expanded “metrics” or reporting requirements to identify those exceptional outage frequencies or durations, or other, e.g., extreme customer wait times in customer service that may expose a significant flaw that should be immediately remedied and sought to be reduced or eliminated in the future.

Xcel identified five goals as the basis for the development of its locational reliability and service quality offering:

1. Offer information in a meaningful format and in a manner not presently provided;
2. Be cognizant of what the average customer could quickly understand and interact with;
3. Provide the appropriate range of data to allow perspective;
4. Consider the need to protect grid security and customer privacy and confidentiality; and
5. Be responsive to stakeholder requests for provide locational data that could be layered with additional data components.

The Company reviewed the offerings it has made to date regarding locational reliability and reiterated its opposition to providing or illustrating data in a feeder format. Xcel’s position is that providing information in a feeder format create security, privacy and confidentiality issues for the grid and the Company’s customers. Xcel is willing to discuss further how to present the reliability and customer service information that SRA, FE and the City of Minneapolis in its Comments, have identified.

The Department concluded in our reply comments that additional information and analysis is required regarding these reliability and customer service issues concerning equity and locational reliability. We recommended that the Commission identify a process for resolving the security, privacy and confidentiality issues that Xcel identified in this docket.

We continue to support that recommendation. None of the parties that submitted reply comments provided enough additional information or analysis to cause us to change that position.

III. DEPARTMENT RECOMMENDATIONS

Based on its review, the Department concludes that the Company has met all the applicable reporting requirements and recommends that the Commission accept Xcel's 2019 Annual Service Quality Report with an additional reporting requirement that the Company discuss its efforts to improve the reliability of its Customer Resource System in its 2020 Annual Service Quality Report.

However, if the Commission wishes to see a steady improvement in Xcel's metrics, the Commission may wish to freeze the metrics for the Metro East SAIDI and CAIDI, and the Northwest SAIDI and CAIDI at the levels set in 2019 and not allow the numbers to increase at this time. Alternatively, the Commission may wish to require Xcel to report in its next service quality filing on improvements that the Company has made to its system in the Metro East and Northwest work centers.

The Department also recommends approval of the Company's request for a variance to Minn. R. 7826.0500, Subpart 1.G if Xcel maintains copies of all individual reports provided to the Commission's Consumer Affairs Office.

We also continue to recommend that the Commission identify a process for resolving the security, privacy, and confidentiality issues that Xcel has identified relative to customer service, locational reliability and equity.

/ar

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce
Response Comments**

Docket No. G002/M-20-406

Dated this **6th** day of **October 2020**

/s/Sharon Ferguson

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