

July 14, 2020

Will Seuffert  
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-20-460

Dear Mr. Seuffert:

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

*2019 Annual Natural Gas Service Quality Report* submitted by Northern States Power Company, a Minnesota Corporation (Xcel or the Company).

The *2019 Annual Natural Gas Service Quality Report* (Report) was filed on May 1, 2019 by:

Gail Baranko  
Regulatory Manager  
414 Nicollet Mall – 7th Floor  
Minneapolis, Minnesota 55401

Based on its review of Xcel's 2019 Report to date, the Department recommends that the Company provide further information to support its Report; the Department intends to provide further comments, subsequent to reviewing additional information from Xcel.

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

Sincerely,

/s/ JOHN KUNDERT  
Public Utilities Financial Analyst

JK/ar  
Attachment

**Before the Minnesota Public Utilities Commission**

---

**Comments of the Minnesota Department of Commerce**  
**Division of Energy Resources**

Docket No. G002/M-20-460

**I. BACKGROUND**

Over the past decade or so, the Minnesota Public Utilities Commission (Commission) initiated and increased the reporting requirements for natural gas local distribution companies regarding service quality and reliability.<sup>1</sup> The initial proceeding was Docket No. G999/CI-09-409 and the key Commission Order was dated August 10, 2010.<sup>2</sup> Table 1 summarizes the requirements listed in that Order.

**Table 1 – Reporting Requirements included in Docket No. G999/CI-09-409,  
Order dated August 26, 2010**

<b>Number</b>	<b>Metric</b>	<b>Requirement</b>
1.	Call center response times	Percentage of calls answered within 20 seconds
2.	Meter reading performance data included in Minn. Rules, part 7826.1400	The number and percentage of customer meters 1) read by utility personnel, 2) by self-read customers, and 3) not been read by utility personnel for periods of six to 12 months and longer than 12 months, along with data on meter-reading staffing levels by work center or geographical area
3.	Involuntary service disconnection data as referenced under Minn. Stat. §§ 216B.091 and 216B.096, subd. 11 in lieu of reporting data on involuntary service disconnections contained in Minn. Rules part 7826.1600, items A and B	Detailed monthly reports on residential service disconnections with additional requirements for the winter season – October through April. All requirements listed in Attachment 1. Number of customers whose service is disconnected or remains disconnected for nonpayment beginning in October and a weekly report beginning in November with that same information
4.	Service extension request response time data contained in Minn. Rules, part 7826.1600, items A and B, except the data reported under Minn. Stat. 216B.091 and 216B.096, subd. 11 is not required	The number of customers requesting a service extension by customer class, the interval between the date the service was installed and the latter of the customer-requested in-service date or the date the premises were ready for service and the number of customers requesting service at a location previously served by the utility and the intervals between the date service was installed and the later of the in-service dates listed above.

---

<sup>1</sup> These requirements are modeled after the electric utility standards contained in Minn. Rules, Chapter 7826.

<sup>2</sup> *In the Matter of a Commission Investigation Into Gas Utility Service Quality Standards*, Order Setting Reporting Requirements.

Number	Metric	Requirement
5.	Customer deposit data identified in Minn. Rules part 7826.1900	Must include the number of customers who were required to make a deposit as a condition of receiving service
6.	Customer complaint data contained in Minn. Rules part 7826.2000.	See Attachment 2 for a complete list
7.	Gas emergency phone line calls telephone answer time	Telephone answer time
8.	Mislocates data - Xcel is allowed to include both gas and electric in its report.	Also includes the number of times a line is damaged due to mismarked line or failure to mark a line.
9.	Gas lines damaged data	Categorized as to cause – 1) utility employees or contractors or 2) unplanned causes.
10.	Service interruptions	Categorized as to cause – 1) utility employees or contractors or 2) any other unplanned cause.
11.	Summary of major events that are immediately reportable to the MnOPS <sup>3</sup> in annual report	Shall provide summaries of all service interruptions caused by service integrity pressure issues.
12.	MnOPS events to Commission and Department	Location and cause of event, the number of customers affected, the expected duration of the event and an estimate of when service will be restored.
13.	Gas emergency response times	Percentages of emergencies responded to within one hour and within more than one hour
14.	Customer-service related operations and maintenance expenses	Minnesota-regulated, customer-service expenses, which shall be based on costs in FERC <sup>4</sup> accounts 901 and 903 plus payroll taxes and benefits.

In its November 30, 2010 *Order* in Docket Nos. E,G002/M-09-224 and G002/CI-08-871 the Commission included additional reporting requirements for Xcel’s natural gas utility. Those requirements focused on how the Company handled field orders. Table 2 (see below) lists those requirements.

The Commission also began to refine the information Xcel provided in the fifteen different reporting requirements. For example, in an Order dated March 6, 2012 in Docket No. G002/M-11-360 *et al.*, the Commission directed all regulated Minnesota natural gas utilities to provide additional information on the following topics – 1) call center response times, 2) estimated meter reads, 3) service extension requests, 4) customer deposits, 5) MnOPS emergency calls, and 6) call center complaints. Table 3 lists those additional requirements relative to the original metrics.

---

<sup>3</sup> MnOPS is an abbreviation for the Minnesota Office of Pipeline Safety.

<sup>4</sup> FERC is an abbreviation for the Federal Energy Regulatory Commission.

**Table 2 – Reporting Requirements included in Docket Nos. E,G002/M-09-224 and G002/CI-08-871 in Order dated November 30, 2010**

Number	Metric	Requirement
15.	Field Orders	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 Volume of excluded field orders

**Table 3 – Refinement of Reporting Requirements included in Docket No. G002/M-11-360 *et. al.* for Xcel Energy**

# from Table 1 or 2	Metric	Requirement
1.	Call Center Response Times	Reconcile gas-related call center complaints with the categories contained in Minn. Rules, part 7826.2000
2.	Meter Reading	Explain 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.
4.	Service Extensions	Require reporting on the types of extension requests for both locations previously and not previously served
5.	Customer Deposits	Require reporting of the different types of deposits included in the reported number of “required customer deposits”
10.	Service Interruptions	Require additional reporting on whose service was interrupted and the average duration of the interruptions.
13.	Gas emergency response times	Require the types of gas emergency calls included in their emergency response times and types of emergency calls included in reports to MnOPS. Also require an explanation of any difference between the reports provided to the Commission and MnOPS.

The Commission provided further refinement to this list in its April 7, 2014 *Order* in Docket No. E,G002/M-13-371. This Order required Xcel to provide complete and accurate meter-reading data with multiple reads excluded in future reports.

The Commission's April 12, 2019 *Order Accepting Report and Setting Additional Reporting Requirements* in Docket No. G-002/M-18-316 required Xcel to provide additional information in the Company's 2018 report:

- a. The utility's filing under 49 CFR 192.1007 (e): integrity management plan performance measures; monitoring results; and evaluation of effectiveness in a manner to establish a baseline for ongoing reporting.
- b. A summary of any 2018 emergency response violations cited by MnOPS along with a description of the violation and remediation in each circumstance.
- c. The number of violation letters received by the utility from MnOPS during the year in question.
- d. A discussion of how to provide ongoing monitoring and metrics towards the deployment of Excess Flow Valves (EFV) and manual service line shutoff valves pursuant to the Commission's order in Docket No. G-999/CI-18-41.

The Commission's November 14, 2019 *Order in the Matter of Xcel Energy's Natural Gas Service Quality Report for 2018* in Docket No. G002/M-19-305 required Xcel to file:

- a. an update of: integrity management plan performance measures; monitoring results; and evaluation of effectiveness;
- b. the uniform reporting metrics for installation of excess flow valves (EFV) and manual service line shutoff valves, to be developed as follows: By December 6, 2019, after consultation with the other gas utilities obligated to report EFV metrics, shall provide recommendations for uniform reporting of annual and overall EFV and manual shutoff valve installation on their distribution system. The recommendation could include:
  1. a uniform definition of the number of customers suitable for EFV;
  2. a uniform definition of the number of customers suitable for manual shut-off valves;
  3. a uniform metric to be reported as a percentage of customers with installation of both;
  4. metrics for the number of customers receiving installations upon request prior to a system upgrade that would require the installation of EFVs.

On January 7, 2020, the Commission issued its *Order Setting Reporting Requirements* in Docket No. G002/M-19-305. In that Order, at Ordering paragraph 2, the Commission required Xcel to file additional information on 1) leak count by facility type and threat, 2) leak count on main by material and 3) leak count on service by material.

On May 1, 2020, Xcel filed its 2019 *Natural Gas Service Quality Performance Report* (2019 Report). The Department provides its analysis of the 2019 Report below.

## II. DEPARTMENT ANALYSIS

Each year, the Department analyzes the information provided in the annual report in the context of past reports. Overall, the Department identified no major concerns regarding Xcel's 2019 Report. However, as discussed below, the Department requests that the Company provide more information regarding certain data revisions that Xcel filed on July 7, 2020.

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.

**Table 4: Call Center Response Time<sup>5</sup>**

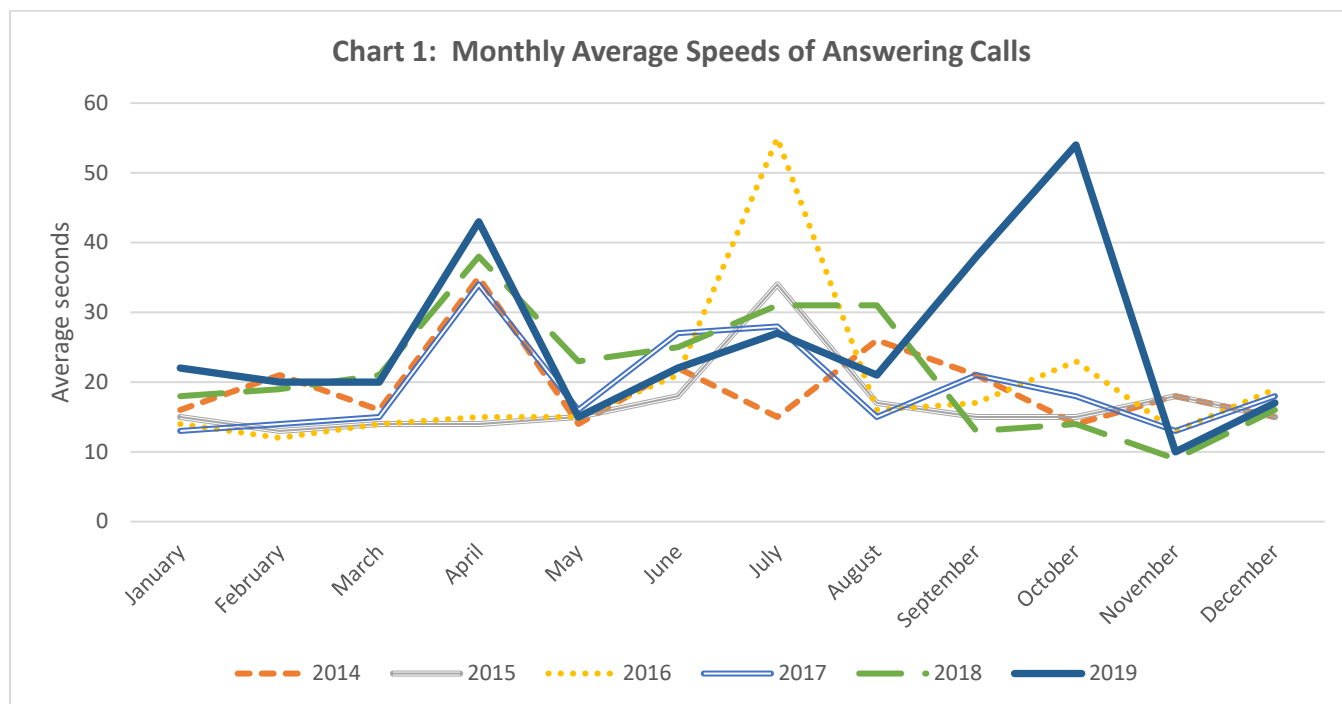
Year	12 Mo. Avg.	Avg. Speed (Seconds)	# of calls
2010	83.0%	n/a	3,833,374
2011	86.2%	20	3,783,176
2012	89.4%	19	3,682,314
2013	89.0%	26	4,009,067
2014	90.0%	20	3,758,280
2015	90.9%	18	3,743,635
2016	89.9%	21	3,579,038
2017	90.1%	21	3,222,187
2018	91.1%	22	3,042,040
2019	90.8%	27	2,882,333

As shown in Table 4 above, Xcel was able to answer 80 percent, or more, of calls within 20 seconds, with an average of 90.8 percent of calls being answered within 20 seconds in 2018.

However, the overall average speed of answering calls was longer than in previous reports, at 27 seconds overall for 2019. The pattern of average speed by months over the years, in general, seems to indicate that the Company's customers have longer wait times in April, when the Cold Weather Rule is deactivated. While this pattern is understandable, in 2019, Xcel's customers experienced somewhat longer wait times in April and much longer wait times in September and October. Chart 1 below compares the monthly wait times in 2019 with those of prior years. The Department requests that the Company discuss in reply comments the reason(s) for the longer wait times in April, September and October 2019.

---

<sup>5</sup> Attachment A, lines 26, 31 and 22.



The Department notes that, in its November 2, 2017 *Order Approving Tariff Modifications and Granting Variance* in Docket No. E,G002/M-17-553, the Commission approved Xcel’s proposed change to call center hours for non-emergency calls, and required the Company to “submit two years annual compliance review in its annual service quality reports for 2018 and 2019.” Xcel stated the following, which the Department understands to be the Company’s compliance regarding customers’ use of its Interactive Voice Response system (IVR) and the impact of the changes to its call center operational hours:<sup>6</sup>

While our call centers are staffed 24/7, our hours of operation for non-emergency calls changed to Monday through Friday from 7:00 a.m. to 7:00 p.m.; and Saturdays from 9:00 a.m. to 5:00 p.m. effective January 1, 2018. Call Center Representatives continue to be available to interact with customers calling regarding electric and natural gas outages and emergency calls 24/7. We have not encountered any technical or other issues.

The number of customer calls selecting an option to speak to an agent after-hours continued to decrease from 2018 to 2019. Our digital strategy has been successful with more customers leveraging self-service offers to transact business. Overall incoming call volume was down 113,000 calls year over year, equating to a three percent decrease. The agent call volume was down 23,000 calls (two percent) while the calls handled by the automated system decreased by 86,000 calls (four percent). We saw an increase of 16.5 percent in customer Ebill enrollments and 9.1 percent in MyAccount enrollments from 2018 to 2019.

<sup>6</sup> 2019 Report, p. 2.

The Department acknowledges that Xcel has fulfilled the requirements of the 09-409 and 11- 360 *Orders*, as well as the Commission’s Order in Docket No. E,G002/M-17-553.

**B. METER-READING PERFORMANCE**

Xcel reported the following metrics for meter-reading performance in Attachment B of its Report, and indicated that the Company included complete and accurate meter-reading data with multiple reads excluded as required by the Commission’s April 7, 2014 *Order* in Docket No. E,G002/M-13-371:

- 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 99.85 percent of customer meters were read by utility personnel in 2019, while 0.0004 percent were read by the customer.<sup>7</sup>

Xcel provided the number of meters unread in 2019 for 6 to 12 months and for more than 12 months for its Residential, Commercial, Industrial, and Other customer classes.<sup>8</sup> “No Reading Returned” was the most common reason across all customer classes for failure of meters to be read.

Table 5 below summarizes the number of meters not read by utility personnel for more than 12 months according to Xcel’s current and past annual reports.

**Table 5: 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	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	578	605	283	50	1,516

---

<sup>7</sup> The Department’s calculations are based on data provided in Tables A and B, Attachment B, page 1 of the 2019 Report.

<sup>8</sup> Tables C-1 and C-2, Attachment B.



There had generally been a downward trend in unread meters from 2010-2017, but there have been increases in the numbers of meters that were not read for longer than 12 months in 2018 and 2019 for the Residential, Commercial and Industrial classes. The Department requests that the Company explain in reply comments why the total number of meters not read for longer than 12 months is at the highest level since 2010 and why the number of Commercial meters not read for longer than 12 months is the highest level recorded. Regarding this issue, Xcel stated:

The majority of commercial meters that have “No Read Returned” are situations where the customer is offsite or denies access, the meter has low usage and is a low priority for the customer. Most often, the customer needs to perform an action such as faulty wires on the customer’s side; breakers turned off by the customer; the premise is vacant or provide access. In these instances, we will reach out and work with the customer by sending correspondence and letting them know that action needs to be taken on their part[.]<sup>9</sup>

The Department requests that Xcel explain in reply comments how it proposes to address these issues.

Table 6 below summarizes the number of meters not read by utility personnel for periods of 6 to 12 months according to Xcel’s current and past annual reports.

**Table 6: Meters Not Read by Utility Personnel 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	5,237	1,178	260	123	6,798
2015	2,508	942	387	113	3,950
2016	2,268	772	167	75	3,282
2017	1,938	1,118	306	50	3,412
2018	2,313	1,222	489	50	4,074
2019	2,285	1,584	429	61	4,360

The Department requests that the Company explain in reply comments why the total number of meters not read by utility personnel for 6 to 12 months increased in 2018 and 2019 and why the number of Commercial meters not read by utility personnel for 6 to 12 months is at the highest level since 2010.

Xcel provided its monthly staffing levels for its four work centers and for meter readers working in western Minnesota, North Dakota and South Dakota.<sup>10</sup> The Company averaged a total of 12.2 meter reading staff in 2019, the same as in 2018.

---

<sup>9</sup> Pages 3-4 of petition.

<sup>10</sup> 2019 Report, p. 4.

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

### 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).<sup>11</sup> Table 7 below summarizes residential customer disconnection statistics reported by Xcel:

**Table 7: Residential Customer Involuntary Disconnect Information**<sup>12</sup>

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	1,168,975	105,561	105,561	100%	25,532	21,860
2015	1,042,775	151,956	151,956	100%	26,657	22,452
2016	870,665	130,052	130,052	100%	20,584	17,352
2017	747,409	140,943	140,943	100%	19,212	13,182
2018	559,011	115,472	115,472	100%	17,310	14,474
2019	521,548	92,122	92,122	100%	16,693	15,163

The Department acknowledges that Xcel has fulfilled the involuntary disconnection information 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.

<sup>11</sup> Docket Nos. E,G999/PR-10-02, E,G999/PR-11-02, E,G999/PR-12-02, E,G999/PR-13-02, E,G999/PR-14-02, E,G999/PR-15-2, E,G999/PR-16-2, E,G999/PR-17-2, E,G999/PR-18-2, E,G999/PR-19-2 and E,G999/PR-20-2.

<sup>12</sup> The Department's calculation for 2019 are based on data provided in Attachment C of the 2019 Report.

Table 8 below summarizes Xcel's service extension information for new service requests.<sup>13</sup>

**Table 8: Service Extension Requests**

Year	Residential		Commercial	
	# 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
2015	1,406	0.50	149	1.20
2016	1,760	0.70	120	1.50
2017	1,585	1.10	196	1.90
2018	1,902	6.80	88	7.55
2019	3,065	9.80	186	10.60

The average number of days for completing installs that the Company reported for 2019 is significantly larger than previous years. The Company stated that 2019 was the second year service that extension information was sourced from its new Systems, Applications and Products in Data Processing (SAP) work management system. Xcel acknowledged that it is continuing:

...to adapt to the new processes to maximize workflow management. As we worked with the system this past year, we discovered areas in our end-to-end management of service extensions that require further refinements such as the handoffs and tracking between the groups that support this work. We are currently working through a phased approach training initiative across our Distribution organization to implement consistent processes for better accuracy of data collection for residential and commercial services, which will improve process performance and document accurate completion and closure of work orders.<sup>14</sup>

Xcel also stated that its new SAP system allowed it to design a service extension process that better captures the data points required for measuring the time from when a customer requests installation to the time when that process is completed. Further, SAP excludes instances involving reconnections to existing locations with a new occupant and where an existing service was reconnected after a service upgrade.

As such, the Company stated that, going forward, the data reported in this category will not be comparable to past reports. The Department agrees with this assessment and appreciates that the reported data going forward will more accurately reflect the reporting requirement. The Department acknowledges that Xcel has fulfilled the requirements of the 09-49 and 11-360 *Orders* regarding service extension reporting.

---

<sup>13</sup> Attachment D of Xcel's annual reports.

<sup>14</sup> 2019 Report, page 5.

#### *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 486 such accounts for both its natural gas and electric operations in 2019.<sup>15</sup> Table 9 below summarizes the information regarding customer deposits.

**Table 9: 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%
2015	365	-39.77%
2016	561	53.70%
2017	314	-44.03%
2018	394	25.48%
2019	486	23.35%

Per the 11-360 *Order*, the utilities are 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 who 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 customer deposit information 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;
- D. the number and percentage of all complaints resolved by taking any of the following actions:
  - a. taking the action the customer requested;

---

<sup>15</sup> 2019 Report, p. 5.

- 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 10, Xcel reported that the Company's Customer Advocate Group (CAG) handled 756 electric and natural gas complaints in 2019, 390 of which were forwarded by the Consumer Affairs Office (CAO).<sup>16</sup>

**Table 10: Customer Complaints Handled by CAG**

Year	# Handled by CAG	# Forwarded by CAO	% Resolved on Initial Inquiry	% Resolved by Taking Customer-Requested Action	Top Complaint Category
2010	693	124	17.0%	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
2015	789	129	14.3%	29.5%	Inadequate Service
2016	547	102	16.3%	32.7%	Inadequate Service
2017	572	113	18.0%	27.1%	Inadequate Service
2018	664	248	20.6%	26.7%	Inadequate Service
2019	756	390	14.0%	26.7%	Inadequate Service

The Department notes that 2019 had the largest number of complaints forwarded from the CAO to the CAG than in any previous year, with approximately the same percent of complaints resolved by taking action requested by the customer as in prior years.

In addition to the complaints listed above, as shown in Table 11, Xcel received 550,327 complaints in 2019 through its call centers, the lowest number since 2011.<sup>17</sup> Approximately 99 percent of these complaints were resolved by taking the action the customer requested.

---

<sup>16</sup> Attachment E of Xcel's 2019 Report.

<sup>17</sup> The complaint totals are sums of the monthly data provided in Attachment E of the 2019 Report.

**Table 11: 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
2015	797,237	96	Billing Errors
2016	736,308	97	Billing Errors
2017	665,739	96	Billing Errors
2018	624,399	98	Billing Errors
2019	550,343	99	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.<sup>18</sup> The majority of Xcel's complaint categories fell within the "Billing Error" and "Inadequate Service" categories in the Rules. Those two categories accounted for eighty-nine percent of the calls logged.

The Department acknowledges that Xcel has fulfilled the customer complaint reporting 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 12.<sup>19</sup>

**Table 12: 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
2015	29,064	14	18,567	14
2016	35,921	11	7,146	14
2017	43,037	7	6,995	12
2018	44,303	5	6,698	12
2019	43,204	4	8,078	8

<sup>18</sup> Attachment E1 of Xcel's 2019 Report.

<sup>19</sup> Attachment G of Xcel's 2019 Report.

The number of gas emergency calls in 2019 declined slightly from 2018 but remains higher than the numbers prior to 2017. However, the Company transitioned to a different automated menu system for their Gas Emergency phone line in 2018. In its 2017 Report in Docket No. G002/M-18-316, the Company stated the following regarding the change and increase in call volume for 2017, which at the time was the highest since 2011:

While we showed improvement over last year's emergency gas call response time results during 2017, we continue to see an overall volume increase to our gas line. The menu change to our automated system, which became effective on May 19, 2016, continues to impact our total gas line call volume now that gas (vs. electric) is the first prompt on the main menu. In comparison, the volume levels to the toll-free "gas only" line continue to decrease.

As reported last year, we predicted the new menu structure would continue to create a higher than normal call volume to our gasline due to callers choosing option 1 either in error, out of habit or with the expectation of having their calls answered quickly for faster assistance. With the change in operational hours, which became effective January 1, 2018, customers who prompt into the gas emergency line with non-electric outage or non-gas related issues during business hours those calls will continue to be handled by our Agents. During non-business hours, customers will be immediately notified that the gas line needs to be kept open for gas related emergencies and will then be redirected. We expect that over time this procedural change will eventually affect customer actions toward selecting the appropriate prompt options, which will help reduce the number of "miss-prompt calls" from the volume totals.<sup>20</sup>

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

#### *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 arrive 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 13.<sup>21</sup>

---

<sup>20</sup> 2017 Report p. 6.

<sup>21</sup> Attachment I of 2019 Report.

**Table 13: 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	11,028	40.30	84%
2013	13,801	41.73	83%
2014	14,548	40.00	85%
2015	13,587	38.13	87%
2016	12,811	36.82	88%
2017	13,230	38.35	87%
2018	13,500	35.92	92%
2019	15,238	40.11	92%

The Department notes that Xcel has improved its average response since 2010. The Company's average response time increased by roughly 12 percent to slightly over 40 minutes in 2019, with 2018 seeing the quickest time to respond at just under 36 minutes. One would expect some variation in an annual operational metric like this one and thus the Department concludes that there likely is not an issue at this time. However, if the average response time continues to increase over the next two or three years, the Commission may want to ask Xcel to explain what is happening and how the Company is addressing any such trend.

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 Form for 2019 in Attachment H of its Report. In 2019, there were 11,827 calls that were reportable to MnOPS.<sup>22</sup>

The Department acknowledges that Xcel has fulfilled the gas emergency response time reporting 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 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 14.<sup>23</sup>

---

<sup>22</sup> Attachment H, p. 1 of 2019 Report.

<sup>23</sup> Attachment J of 2019 Report.



**Table 14: 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
2015	46	179,362	0.26
2016	41	171,455	0.24
2017	44	177,703	0.25
2018	36	185,760	0.19
2019	46	224,234	0.21

The Department acknowledges that Xcel has fulfilled the mislocate reporting 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 system damage data are summarized in Table 15 below.<sup>24</sup>

**Table 15: 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
2015	91	229	320	9,238	3.46
2016	71	271	342	9,292	3.68
2017	66	170	236	9,374	2.52
2018	63	184	247	9,455	2.61
2019	64	162	226	9,533	2.37

The Company reported a rate of 0.67 damage incidents caused by Xcel or contractors per 100 miles of main and 1.7 damage incidents from other causes per 100 miles of main in 2019.

The Department acknowledges that Xcel has fulfilled the system damage information 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 event. Unplanned service interruptions are those due to action or inaction by Xcel employees and contractors, or other unplanned causes. Summarized in Table 16 are Xcel's service interruption data.

<sup>24</sup> Attachment K of 2019 Report.

**Table 16: 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
2015	715	32	1:55	263	1:57
2016	606	25	1:34	252	1:50
2017	401	19	0:58	161	1:39
2018	904	32	0:28	408	0:13
2019	4,181	23	1:32	148	2:12

In 2019, 4,181 homes were affected by 171 gas service interruptions, by far the highest level since this reporting began.<sup>25</sup> Additionally, 23 outages affecting 307 homes were caused by Xcel employees and contractors, compared with 148 outages affecting 3,874 homes occurring due to other causes in 2019.

The average duration of gas-service interruptions in 2019 was 1:32 hours/minutes for outages associated with Xcel employees and contractors, and 2:12 hours/minutes for the outages due to other causes. While the number of houses affected increased by 362 percent, the number of service interruptions by both Xcel and its contractors declined by 61 percent. Still, the average time a customer was affected was much higher when compared with previous years.

The Department asked the following multi-part information request (Department information request #1) in an effort to develop some additional context around these service interruption figures.

- Provide a narrative that explains why natural gas service interruptions increase from 904 homes in 2018 to 4,181 homes in 2019.
- Please explain why the average outage time increased from 13 minutes in 2018 to 2 hours and 12 minutes in 2019.
- Did Xcel take any special measures to maintain/restore service to these homes or to affected homeowners/resident's well-being during these service interruptions?

In a preamble to its responses to these questions, Xcel explained it had uncovered some errors in its 2018 and 2019 service interruption data reporting. The revised information increased the number of homes that had service interruptions in 2018 and lowered the number of homes that had service interruptions in 2019. Table 16-a summarizes these revisions and compares them to the original information reported.

---

<sup>25</sup> Attachment L of Xcel's 2019 Report.

While the Department appreciates Xcel's efforts to correct the information it is providing to the Commission, the variability of the estimates included in Table 16-a below is concerning. The Company claims in its response to the Department's information request that the revised numbers are the result of a concerted effort to address inconsistencies in the original information. Further, the Department notes that most of the revisions in numbers appear to be within a relatively small range.

However, there are two changes that warrant further explanation from Xcel. First, Xcel should explain further why the number of incidents decreased by over half, from 440 to 209. Second, the 700 percent increase in the Company's average outage time for 2018, from 14 minutes to nearly 2 hours, is unsettling from a reporting standpoint.

Thus, the Department requests that Xcel provide further information in reply comments regarding:

- 1) the causes for the longer response times in 2018
- 2) the reasons for the significant revisions in data and
- 3) any changes made to ensure that reporting has better oversight.

**Table 16-a Revised Natural Gas Service Interruption Information for 2018 and 2019**

Description	Original	Revised	Difference	Percentage Change
All Outages in 2018 (# of homes)	904	942	+38	+4.2
All Outages in 2019 (# of homes)	4,181	3,465	-716	-17.1
All Incidents in 2018	440	209	-231	-52.5
All Incidents in 2019	171	145	-26	-15.2
Avg Outage Time (Hours:Minutes) in 2018 <sup>26</sup>	0:14	1:55	+1:41	+721
Avg Outage Time (Hours:Minutes) in 2019	2:07	1:54	-0:13	-10.2

Xcel's response to subpart (a) regarding the increase in the number of homes that experienced natural gas outages explained in part:

. . . Increase in service interruptions were predominantly due to the polar vortex event and three 3<sup>rd</sup> Party damages in Moorhead, Cleveland, and Minnesota City. These four events account for over 95 percent (2,411) of the increase in 2019. . . .

---

<sup>26</sup> Note that the response times shown in Table 16-a combine the average response times of outages caused by Xcel and those caused by others.

The Company's response to subpart (b) regarding the significant increase in the response times between 2018 and 2019, based on the Company's originally reported data stated:

After correcting the data, the 2018 average outage time is in line with 2019.

Xcel's response to subpart (c) as to whether Xcel took any special measures to maintain/restore service to homes affected by service interruptions explained in part:

Due to the duration of the Polar Vortex Princeton outage, Xcel Energy worked with local government and emergency management officials and coordinated with these officials to aid our outreach to ensure resident safety. We secured alternative lodging accommodations for impacted customers and provided winterization resources including space heaters and professional plumbers to help customers prevent their pipes from freezing.

The Commission initiated Docket No. E,G999/CI-19-160, which was an inquiry into the effects of that severe weather. One result of that inquiry is that Xcel filed natural gas system reinforcement plans for the areas affected by that weather event. Hence, the Department believes this issue is expected to be addressed in the near-term from a reliability perspective.

The Department acknowledges that Xcel has fulfilled the natural gas service interruption data 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 following ten items that the MnOPS requires in its incident reports:

- 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 34 such major events during 2019.<sup>27</sup> The Company provided a table of data concerning major incidents, which includes all ten items required by MnOPS.

The Department acknowledges that Xcel has fulfilled the requirements of the 09-409 *Order* regarding major events reported to MnOPS.

*M. CUSTOMER-SERVICE-RELATED EXPENSES*

The customer-service-related expenses reporting metric is the total operation and maintenance expenses incurred related to customer service. The 2019 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 17 below summarizes Xcel's reported customer-service expenses for its Minnesota jurisdiction.<sup>28</sup>

**Table 17: Customer-Service Expenses: Minnesota Jurisdiction**

Year	FERC 901 and 903	Associated Payroll & Tax Benefits	Total
2010	\$5,612,215	\$396,149	\$6,008,364
2011	\$5,927,900	\$391,843	\$6,319,743
2012	\$5,896,206	\$436,123	\$6,332,329
2013	\$5,799,728	\$431,478	\$6,231,206
2014	\$5,617,750	\$374,554	\$5,992,304
2015	\$5,424,808	\$388,260	\$5,813,068
2016	\$5,317,939	\$381,388	\$5,699,327
2017	\$5,034,393	\$388,921	\$5,423,314
2018	\$4,609,709	\$382,521	\$4,992,230
2019	\$5,199,451	\$306,623	\$5,506,074

The Department acknowledges that Xcel has fulfilled the O&M expense reporting 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 have traditionally been provided for both electric and gas service in Xcel's annual electric service quality dockets. Xcel's meter equipment malfunction data are summarized in Table 18.<sup>29</sup>

---

<sup>27</sup> Attachment M of Xcel's 2019 Report.

<sup>28</sup> Attachment N of Xcel's 2019 Report.

<sup>29</sup> Attachment O of Xcel's 2018 Report.

**Table 18: Meter Equipment Malfunction**

Year	# of Orders for Gas Meter Equipment Malfunctions	Average Days to Resolve	# of Exclusions for Meter Access issues
2012	2,891	2.97	365
2013	3,286	3.07	608
2014	3,376	3.43	613
2015	2,956	2.94	533
2016	3,966	3.36	399
2017	3,638	3.67	466
2018	3,670	4.05	515
2019	3,626	5.03	619

The Department notes that the average number of days to resolve meter equipment malfunctions has increased over time, with 2019 reflecting the highest number of days. While the Department acknowledges that Xcel has fulfilled the requirements of the 08-871 *Order*, we also request that Xcel explain in reply comments why it has taken the Company longer to resolve meter equipment malfunctions.

*O. ADDITIONAL REPORTING REQUIREMENTS*

The Commission's April 12, 2019 Order in Docket No. G002/M-18-316 required the Company to provide the following information in addition to that which is required in its annual service quality report.

- A. The utility's filing under 49 CFR 192.1007 (e): integrity management plan performance measures; monitoring results; and evaluation of effectiveness in a manner to establish a baseline for ongoing reporting.*

The Company included this information in Attachment P of its 2019 Report.

- B. A summary of any 2019 emergency responsive violations cited by MNOPS along with a description of the violation and remediation in each circumstance.*

In compliance with this ordering point, the Company stated that it did not receive any emergency response violations cited by MNOPS in 2019.

- C. The number of violation letters received by the utility from MnOPS during the year in question.*

The Company stated that it received 21 violation letters related to Minnesota Statute 216D for locating issues in 2019. The Company stated the following regarding the violation letters it receives and its processes surrounding the issues:<sup>30</sup>

Violation letters are typically triggered by a MnOPS inspection, damage that occurred in the field, or a complaint from an excavator. Upon receipt of a MnOPS violation letter, the Company is given a set amount of time (determined by MnOPS) to provide a response outlining a remediation plan or other steps taken to remediate the violation. MnOPS closes these items with either a letter or a verbal notification. Annually, the Company staff meets with MnOPS to review the incidents that occurred in the previous year and their disposition.

*D. A discussion of how to provide ongoing monitoring and metrics towards the deployment of Excess Flow Valves and manual service line shutoff valves pursuant to the Commission's order in Docket No. G-999/CI-18-41.*

The Company stated that it does not have a program in place to install Excess Flow Valves (EFVs) or manual shut-off valves as a service in itself, but rather installations occur on a case-by-case basis when new service lines are installed, existing service lines are repaired or replaced, or a customer requests installation. In its December 18, 2018 Compliance Filing in Docket No. G999/CI-18-41, the Company stated the following regarding the matter:<sup>31</sup>

The Company does not currently have specific plans for replacing all services throughout the Company's service territory. There are similar projects to replace problematic service as a part of our Gas Utility Infrastructure Cost (GUIC) Rider initiative, but this programmatic approach targets the replacement of legacy poor performing pipelines. The Company deems a main or service line to be poor performing through analysis of performance as well as monitoring industry trends and issues. The Company monitors and reviews the leak history of pipe material types and/or year of installation. Trends of increasing leak ratio or risks associated with certain pipe types are studied to prioritize the replacement of lines under the GUIC. It may take several decades to replace all services that do not currently have an EFV.

In addition to the brief discussion provided in the instant filing, the Company provided the following two tables regarding installation statistics on EFV and manual service shut-off valves by customer class.<sup>32</sup>

---

<sup>30</sup> 2019 Report, p. 11.

<sup>31</sup> Compliance Filing, p. 4.

<sup>32</sup> 2019 Report, p. 12

**Table 19: EFV Installation by Customer Class**

Customer Class	Number of Customers Suitable for EFV	Number of Installed EFVs	Percentage of Suitable Customers with EFVs	Number of Customers Unsuitable for EFV
Residential	369,038	142,018	38.48%	65,342
Commercial	16,334	5,076	31.08%	15,682
Industrial	83	29	34.94%	325
Municipal	232	57	24.57%	326
Total	385,687	147,180	38.16%	81,675

**Table 20: Manual Service Shut-Off Valve Installation by Customer Class<sup>33</sup>**

Customer Class	Number of Customers Suitable for Shut-off Valve	Number of Installed Shut-off Valves	Percentage of Suitable Customers with Shut-off Valves
Residential	65,342	135	0.21%
Commercial	15,682	165	1.05%
Industrial	325	5	1.54%
Municipal	325	7	2.15%
Total	81,675	312	0.38%

The Department acknowledges that the Company complied with the Commission's April 12, 2019 Order in Docket No. G002/M-18-316.

*E. Additional information on natural gas leak counts pursuant to the Commission's order in Docket No. G-002/M-19-305.*

The Company noted in the filing that it provides this information to the United States Department of Transportation in its Gas Distribution System Annual Report, which was filed March 11, 2020. Xcel included the information required in a table in its Comments.<sup>34</sup> This information was also included in Attachment P.

Given that this is the first year this information has been provided in this context, the Department simply notes that the Company complied with the requirements in the Commission's order in this docket.

---

<sup>33</sup> Customers who do not fall under the installation requirements of 49 CFR § 192.383 are considered unsuitable for EFV in this table.

<sup>34</sup> 2019 Report. P. 10.



### III. DEPARTMENT RECOMMENDATIONS

Based on its review of Xcel's 2019 *Annual Natural Gas Service Quality Report*, the Department recommends that Xcel explain in reply comments why:

- the reason(s) for the longer average wait times in April, September and October 2019, compared to prior years,
- there have been increases in the numbers of meters that were not read for longer than 12 months in 2018 and 2019 for the Residential, Commercial and Industrial classes, , the number of Commercial meters not read by utility personnel for 6 to 12 months is at the highest level since 2010, and
- it has taken the Company longer to resolve meter equipment malfunctions over time.

Further, we request that Xcel identify in its reply comments how it will address the number of Commercial meters not read by utility personnel for longer than 12 months being at the highest level recorded.

Finally, regarding Xcel's errata filed on July 7, 2020, the Department requests that Xcel provide further information regarding:

- the causes for the longer response times in 2018,
- the reasons for the significant revisions in data, and
- any changes made to ensure that reporting has better oversight.

/ar

**Attachment 1 – MN States 216B.091 and 216B.096, subd. 11 and Minn. Rules Part 7826.1600, items A and B**

**1) 216B.091 Monthly Reports**

- a) Each public utility must report the following data on residential customers to the commission monthly, in a format determined by the commission:
  - i) Number of customers;
  - ii) Number and total amount of accounts past due amount;
  - iii) Average customer past due amount;
  - iv) Total revenue received from the low-income home energy assistance program and other sources contributing to the bills of low-income person;
  - v) Average monthly bill;
  - vi) Total sales revenue;
  - vii) Total write-offs due to uncollectible bills;
  - viii) Number of disconnections notices mailed;
  - ix) Number of accounts disconnected for nonpayment;
  - x) Number of accounts that remain disconnected, grouped by the duration of disconnection, as follows:
    - (1) 1-30 days;
    - (2) 31-60 days; and
    - (3) More than 60 days.
- b) Monthly reports for October through April must also include the following data:
  - i) Number of cold weather protection requests;
  - ii) Number of payment arrangement requests received and granted;
  - iii) Number of rights to appeal notices mailed to customers;
  - iv) Number of reconnect requests appeals withdrawn;
  - v) Number occupied heat-affected accounts disconnected for 24 hours or more for electric and natural gas service separately;
  - vi) Number occupied non-heat-affected accounts disconnected for 24 hours or more for electric and gas service separately;
  - vii) Number of customers granted cold weather rule protection;
  - viii) Number of customers disconnected who did not request cold weather rule protection; and
  - ix) Number of customers disconnected who requested cold weather rule protection.
- c) The data reported under paragraphs (a) and (b) is presumed to be accurate upon submission and must be made available through the commission's electronic filing system. A monthly report must be filed with the commission no later than 45 days after the last day of the month for which data is reported.

**2) Minn. Stat. 216B.096, subd. 11**

- a) Annually on November 1, a utility must electronically file with the commission a report, in a format specified by the commission, specifying the number of utility heating service customers whose service is disconnected or remains disconnected for nonpayment as of October 1 and October 15. If customers remains disconnected on October 15, a utility must file a report each week between November 1 and the end of the cold weather period specifying:
  - i) The number of utility heating service customers that are or remain disconnected from service for nonpayment; and
  - ii) The number of utility heating service customers that are reconnected to service each week. The utility may discontinue weekly reporting if the number of utility heating service

customers that are or remain disconnected reaches zero before the end of the cold weather period.

The data reported under this subdivision are presumed to be accurate upon submission and must be made available through the commission's electronic filing system.

## **Attachment 2 – Minn. Rules 7826.2000**

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

- (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;
- (d) The number and percentage of all complaints resolved by taking any of the following actions;
  - (i) Taking the action the customer requested;
  - (ii) Taking an action the customer and the utility agree is an acceptable compromise;
  - (iii) Providing the customer with information that demonstrates that the situation complained of is not reasonably within the control the utility; or
  - (iv) 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.

## **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**  
**Comments**

**Docket No. G002/M-20-460**

Dated this **14<sup>th</sup>** day of **July 2020**

**/s/Sharon Ferguson**

[illegible]

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-460_M-20-460
Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-460_M-20-460
Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No	OFF_SL_20-460_M-20-460
Eric	Lipman	eric.lipman@state.mn.us	Office of Administrative Hearings	PO Box 64620  St. Paul, MN 551640620	Electronic Service	No	OFF_SL_20-460_M-20-460
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E  St. Paul, MN 55106	Electronic Service	No	OFF_SL_20-460_M-20-460
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022093	Electronic Service	No	OFF_SL_20-460_M-20-460
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-460_M-20-460
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_20-460_M-20-460
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_20-460_M-20-460
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750  St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-460_M-20-460

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350  Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-460_M-20-460
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	200 S 6th St Ste 470  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-460_M-20-460
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7  Minneapolis, MN 554011993	Electronic Service	Yes	OFF_SL_20-460_M-20-460