

August 16, 2021

Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
Saint Paul, Minnesota 55101-2147

RE: **Comments of the Minnesota Commerce Department, Division of Energy Resources**  
Docket No. E002/M-21-237

Dear Mr. Seuffert:

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

*2020 Annual Electric Service Quality Report (Report)* submitted by Northern States Power Company, d/b/a Xcel Energy (Xcel or the Company).

The 2020 Report was filed on April 1, 2021.

Based on its review of Xcel's 2020 filing, the Department recommends the Minnesota Public Utilities Commission (Commission):

- Accept the Company's 2020 Safety Report.
- Require the Company to provide additional information for the next two reporting cycles on certain specific electronic utility-customer service tools with the goal of developing benchmarks for those same tools.
- Require Xcel to perform an analysis that models the effects of selling some portion of the service territory contained in the Company's Southeast work center on that work center's reliability metrics. This analysis would be included in the Company's 2021 Service Quality and Service Reliability filing.

The Department also requests that the Company provide information on the following topics.

- Re-designing the Company's Customer Service Quality and Reliability Metrics infographic.
- Additional information as to why the Company vegetation management expenditure decreased by 36 percent from 2019 to 2020.
- Updated information on call-center operations and response times.
- Discuss the Company's expectation for the number of complaints handled by customer agents in 2021.

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- Discuss certain aspects of the Chat feature on the Company's website.
- Development of a complaint category for Distributed Energy Resources (DER) customers by customer class.

As discussed in the attached Comments, the Department provides its responses to the Commission's April 12, 2021 Notice of Comments. The Department will provide additional recommendations in Supplemental Comments.

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

Sincerely,

/s/ JOHN KUNDERT  
Financial Analyst

JK/ja  
Attachment



## Before the Minnesota Public Utilities Commission

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

Docket No. E002/M-21-237

#### I. INTRODUCTION

The Minnesota Department of Commerce, Energy Division (Department) appreciates the opportunity to provide comments regarding Northern States Power, d/b/a Xcel Energy's (Xcel, the Company) Annual Compliance with Annual Safety, Reliability, and Service Quality Metrics for 2021. The Department's comments are structured as follows:

1. Section A: Department's Analysis and Attachment A address the Commission's questions and supporting documentation.
2. Section B contains our analysis of Xcel's Safety information under the Commission rules.
3. Section C contains the analysis of Xcel's Reliability information required by Commission Rules.
4. Section D includes the review of Xcel's Reliability information required by Commission Order.
5. Section E contains our analysis of Xcel's Service Quality information required by Commission Rules.
6. Section F contains the analysis of Xcel's Service Quality information required by Commission Order.

#### A. COMMISSION NOTICE AND TOPICS

In its Notice of Comment Period in this proceeding dated April 12, 2021 the Minnesota Public Utilities Commission (Commission) identified five topics that were addressed to the three rate-regulated investor-owned utilities (IOUs) are open for comment.<sup>1</sup>

1. Should the Commission accept Xcel Energy's ~~Safety~~ Reliability and Service Quality Metrics reports?
2. Should the Commission approve the utility's transition to benchmarking for its annual reliability numbers, including at the work center level?
3. Should the Commission take any action on the engagement plans related to Emergency Management Account status?
4. Do the additional measures of electronic utility-customer interactions provide a more complete picture of how customers experience utilities' customer service?
5. Are there other issues or concerns related to this matter?

The Department's responses to the Commission's questions follow in the order presented in the Notice.

*B. PROCEDURAL CONTEXT*

Minnesota Rules, Chapter 7826 were developed as a means for the Commission to establish safety, reliability and service quality standards for utilities "engaged in the retail distribution of electric service to the public" and to monitor their performance as measured against those standards. There are three annual reporting requirements set forth in the rule:

- the annual safety report (Minnesota Rules, part 7826.0400).
- the annual reliability report (Minnesota Rules, parts 7826.0500, subp. 1 and 7826.0600, subp. 1); and
- the annual service quality report (Minnesota Rules, part 7826.1300).

In addition to the rule requirements, the Commission has requested additional information in its Orders in various dockets. For example, on January 28, 2020 the Commission issued its *Order Accepting Reports, Establishing Reliability Standards, and Requiring Additional Filings* in Docket Nos. E002/M-19-261, E017/M-19-260, and E015/M-18-254. The Commission required all three IOU's to "discuss the feasibility of the following metric, and if the utility does not think the metric is feasible, provide an alternative:

- a. Provide a comparison of the reliability (SAIDI, SAIFI, CAIDI, MAIFI, normalized/non-normalized) of feeders with grid modernization investments, such as Advanced Metering Infrastructure (AMI) or Fault Location, Isolation, and Service Restoration (FLISR) to the historic 5-year average reliability for the same feeders before grid modernization efforts.

In that same *Order* the Commission also required the utilities to "discuss transitioning from a five-year rolling average method of proposing SAIDI, SAIFI, and CAIDI standards, to standards that are similar to the second quartile rank of similarly sized investor-owned utilities under either the IEEE benchmarking study or using United States Energy Information Administration (EIA) reliability data and may propose and discuss other alternatives.

The Commission also set Xcel's reliability Standards for 2019 and required the three IOU's to "develop a summary of their service-quality and reliability metrics that is digestible and useable for general audiences and file it as an attachment to their next annual report due April 1, 2020."

On December 18, 2020 the Commission issued its *Order Accepting Reports, Establishing Reliability Standards, and Establishing Workshop* in Docket Nos. E002/M-20-406, E017/M-20-401, and E015/M-20-404. The Commission required all three IOU's to "discuss and propose a transition to a full benchmarking approach to setting reliability standards" in their respective 2020 service quality reports.

This discussion also involved the Executive Secretary continuing conversations with interested parties regarding work center definitions, benchmarking for individual work centers and other considerations for the transition to benchmarking. That same Order also required all three IOUs to report on customer visits to their respective websites and additional information regarding customer logins and communications.

On April 1, 2021, Xcel filed a petition (2020 Report) to comply with Minnesota Rules Chapter 7826 and the Commission's Orders. In that filing the Company asked the Commission to accept its annual report for 2020 and proposed 2021 reliability standards.

## **II. DEPARTMENT ANALYSIS**

The Department provides:

- responses to the Commission's questions.
- a summary of our review of Xcel's 2020 Safety, Reliability and Service Quality Reports.
- a summary of any applicable reporting requirements included in different applicable Commission Orders; and
- an analysis of certain service reliability metrics by work center.

### **Section A – Response to Commission Questions**

#### *1. Should the Commission Accept Xcel Energy's 2020 Safety, Reliability and Service Quality Reports?*

The Department recommends that the Commission accept Xcel Energy's Annual Safety and Service Quality Reports as the Company has provided the required information. The Department is awaiting additional information regarding the Company's proposed 2021 reliability metrics before making a recommendation regarding that aspect of Xcel's filing. The Company will be supplementing its petition sometime in the fall of 2021. That supplement will include reliability goals developed using the IEEE benchmarking methodology. The Department hopes to file supplemental comments regarding its review of that information soon after Xcel files that information. The Department has a similar position regarding the Annual Service Quality report component of the filing. The Department has requested some additional information concerning metrics covered in that area and would like to review that additional information before making a recommendation.

#### *2. Proposed Transition to Benchmarking for Its Annual Reliability Number, Including at a Work Center Level*

The Department supports including the IEEE benchmarking analysis in the annual reports and is open to using the IEEE benchmarking analysis to set utilities rates if the data is available for Department

analysis. The Department believes it is important for the data used to calculate the IEEE benchmarks be available for analysis if any issues with utility performance arise.

The Department also believes that the continued use of work centers is important. If the utilities continue to report performance based on work center this allows the Commission to obtain a more accurate picture of which portions of the utilities service territories are causing issues and provides more information on the specific causes within each work center. Eliminating the more granular goals would reduce the Commission's ability to pinpoint potential problem areas and may allow utilities to deemphasize the areas in their service territories where service reliability is poor by combining them with areas in which service reliability is average or above average. This approach also appears to be different from the Commission's interest in locational reliability and locational equity expressed in Docket No. E002/M-17-401. Maintaining the current process of establishing work center goals would also not require a variance from Minn. Rules 7826.0500 Subp 1 A-C and Subp 2.

The IEEE analysis is important in that it provides the Commission with a "comparable" group analysis for each of the utilities. This perspective has been lacking historically, so the Department supports the addition of this reporting requirement.

In addition, given that the IEEE benchmarking data is not available until the 3<sup>rd</sup> quarter of the following year, the Department supports a process that the utilities make a supplemental filing within 20 days of receiving the benchmarking data from IEEE. The Department and other interested parties would then have an opportunity to respond to that new information, if warranted. Ultimately, the IEEE benchmarking data will add valuable information and context as the annual reports are processed.

### *3. Commission Action on the Engagement Plans Related to Emergency Medical Account Status*

The Department generally believes that an IOU's engagement plans should be designed so that most customers are aware the program exists. In response to the Commission's December 18, 2020, Order in the 2020 in Dockets. Nos, E002/M-20-406, E017/M-20-401, and E015/M-20-404, Xcel, OTP, and Minnesota Power each submitted compliance filings detailing each utilities engagement plans for Emergency Medical Account protections.

With regards to Xcel, the January 19, 2021 Compliance filing stated that the Company sent 324 letters to hospitals and clinics in Xcel Minnesota service territory explaining the program. Xcel marketing staff also contacted major hospitals in its service territory with the same message. Xcel also stated that it recently contacted retail medical equipment stores about these programs and the Company is also exploring additional platforms for contacting customers. The Department concludes that OTP's proposals for its engagement plan for its Emergency Medical Accounts is reasonable.

Additionally, Xcel, Minnesota Power, and OTP, have collaborated with the Clean Energy Resources Team, and Citizens Utility board to place links on their low-income energy assistance pages to each utilities' respective pages promoting energy assistance and medical necessary protections.

#### *4. Effects of Electronic Utility-Customer Interactions on Customers*

The Department believes that more information on customer interactions, particularly via the internet, are useful. For instance, Xcel reported 12.7 million website visits via Facebook, Twitter and XcelEnergy.com. The Company also identified 19.4 million logins via Xcel's My Account and Mobile Application. While customers still contact the Company in great volumes, with Xcel recording approximately 2.5 million calls in 2020, website interactions are substantial and provide customers with a great deal of information. Therefore, the Department concludes that the additional measures of electronic utility-customer interactions do help provide a more complete picture of how customers experience utilities' service.

Annual service quality reports provide insight into whether ratepayers are receiving safe and reliable service, as well as acceptable physical, financial, and call center services. Yet increasing levels of service are being provided online through utilities' websites, and often are the first place ratepayers connect with their utility.

To build on the Commission's order in the 2020-filed service quality dockets,<sup>1</sup> the Department requests that the Company provide additional information in their annual reports for the next two reporting cycles, to build baselines for web-based service metrics. Specifically, the Department requests that the utilities provide, at a minimum, the following:

- The percentage uptime, to the second decimal, of the utility's:
  - general website
  - payment services
  - outage map and/or outage information page
- the error rate percentage, to the third decimal, of the utility's payment services.
  - If more granular data is available, please break down the error rate for unexpected errors, errors outside of the customer's control (i.e., how often to online payments fail for reasons other than insufficient funds or expired payment methods), and/or some other meaningful categorization.

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<sup>1</sup> Docket Nos. E-002/M-20-406, E-017/M-20-401, and E-015/M-20-404, Commission Order issued December 18, 2020.

Additionally, the Department requests the utility discuss in Reply Comments whether it:

- has a chat feature on its website, and whether that chat feature is:
  - live and staffed by internal utility employees.
  - live and staffed by third-party vendor employees.
  - a chat bot; or
  - something else and/or a combination of the above options.
- uses internal or third-party monitoring of website functionality including, but not limited to, metric analysis and on-call services for critical website failures.

Gathering this data and information in this and next year's filing, across all utilities, should provide the Department with reasonable basis to recommend specific metrics and/or recommendations.

#### *5. Other Issues or Concerns*

The Department identified one issue – the Commission's efforts regarding location equity and reliability performance metrics that were transferred from Docket No. E002/M-17-401. The Department also provides a regression analysis of Xcel's reliability metrics over the past 10 years which it hopes the Commission finds useful.

##### *a. Reliability, Service Quality and Equity Metrics*

The Commission tasked its Staff with creating equity metrics under the service reliability and service quality proceeding.<sup>2</sup> Commission Staff provided a proposal and coordinated two meeting regarding this issue in June 2021. The Department participated in both those meetings and will continue to participate in this aspect of the Xcel's annual SQSR report.

##### *b. Reliability Metric Regression Analysis*

The Department attempted to quantify the Company reliability performance over the past decade for SAIDI, SAIFI and CAIDI. Department staff performed a regression analysis for each of the Company's four work centers using information provided in these annual SQSR reports. The data included covered the ten-year period from 2010 through 2020. While the data varied widely, the regressions do provide a perspective on Xcel's efforts to improve the Company's distribution system's reliability in Minnesota. Surprisingly, the analysis' results are mixed.

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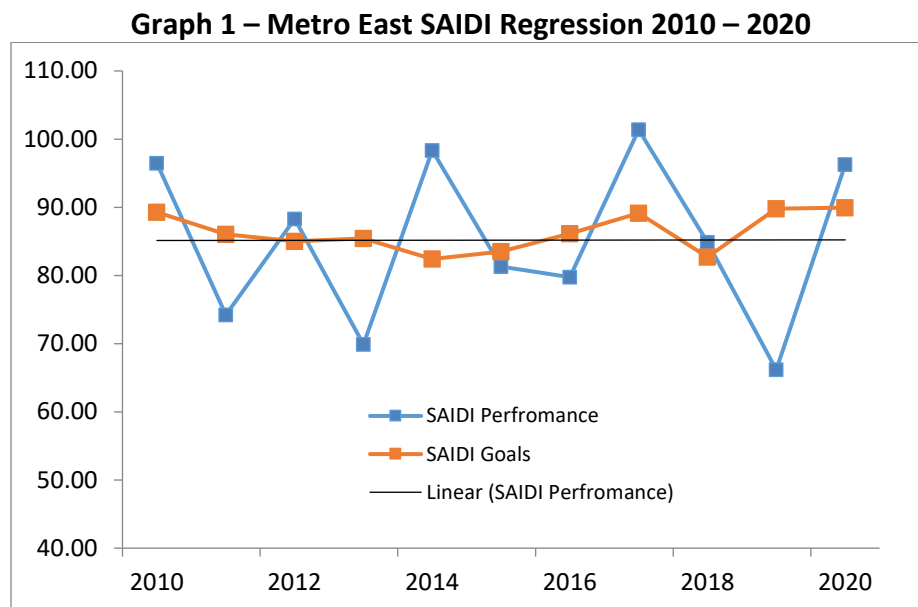
<sup>2</sup> Docket Nos. E002/M-17-401 and E002/M-20-406.



The Department is focused primarily on the linear performance component of these different graphs. The Department's position is that if the slope of that line is negative than it provides some support for the idea that Xcel's performance for that reliability metric is improving over time. If, however, the slope if the linear function is positive, that results suggests that Xcel's performance for that reliability metric is degrading over time.

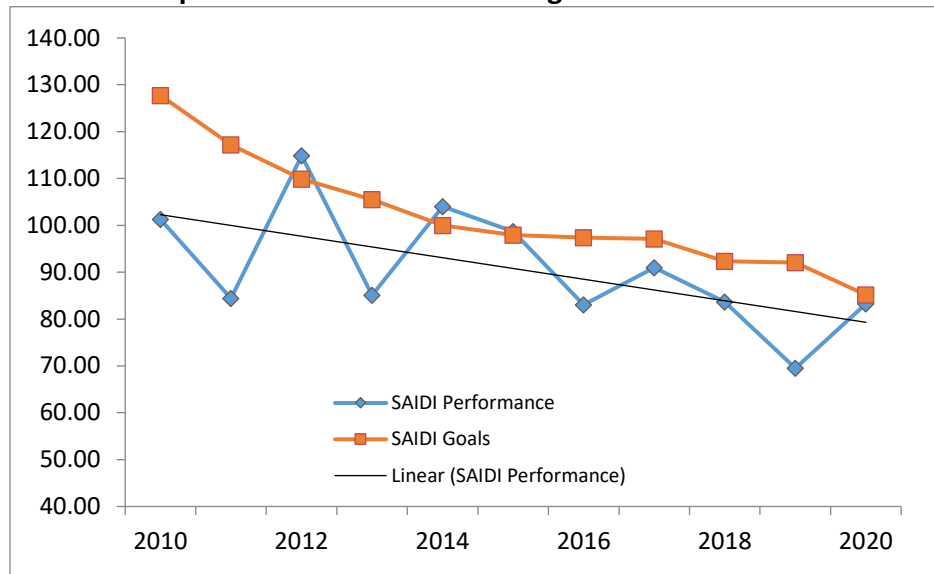
*i) SAIDI Result by Work Center*

Graphs 1 through 4 summarize Xcel's reliability results for its four different work centers.



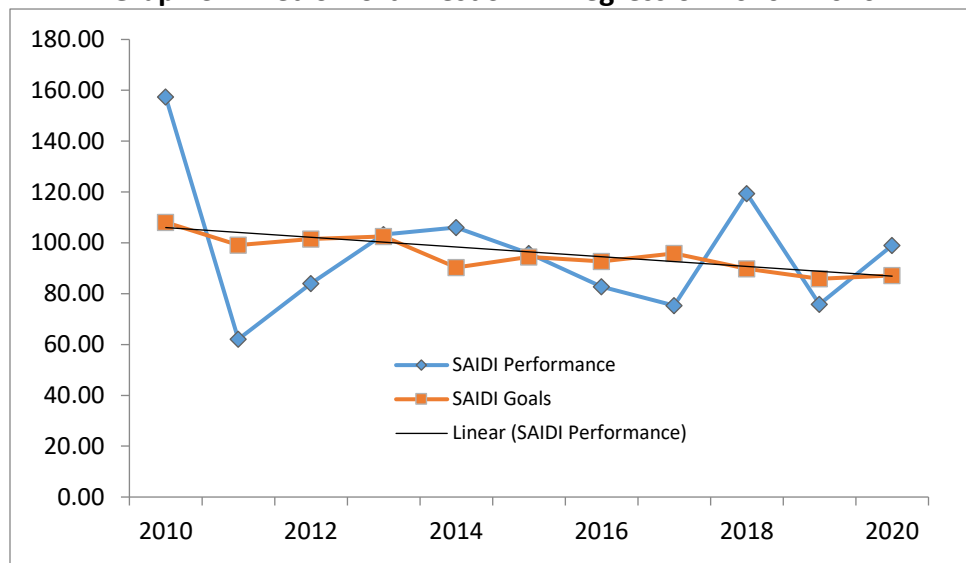
The SAIDI results for the Metro East work center suggest that it is not improving or worsening as the slope of the linear function is flat.

**Graph 2 – Metro West SAIDI Regression 2010 – 2020**



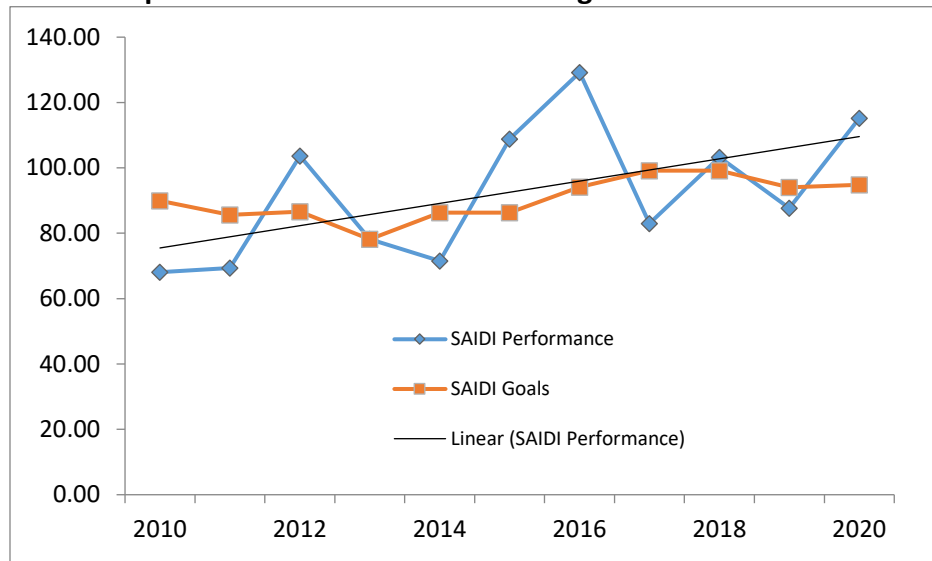
The SAIDI results for the Metro West work center indicate that SAIDI performance is improving as the slope of the linear function is noticeably negative.

**Graph 3 – Metro Northwest SAIDI Regression 2010 – 2020**



The SAIDI results for the Metro Northwest also indicate that SAIDI performance is improving as the slope of the linear function is negative, but not as strongly negative as the results for the Metro West work center.

**Graph 4 – Metro Southeast SAIDI Regression 2010 – 2020**



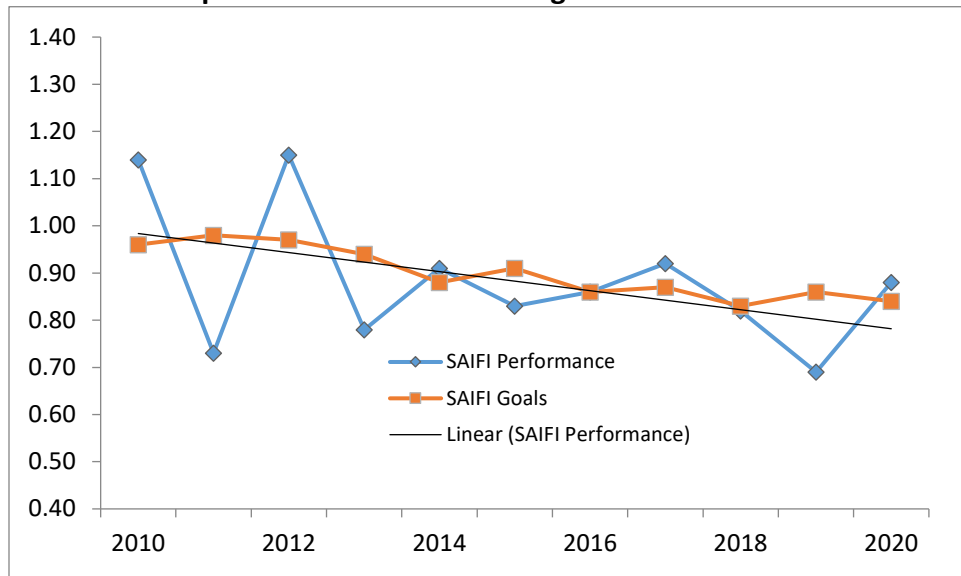
The results for the Southeast work center suggest that SAIDI performance has degraded over the past decade. The slope of the linear function is positive.

In summary, SAIDI performance by work center over the past decade suggests improvement to the metric in the Metro West and Metro Northwest work centers, a stable result in the Metro East work center and a worse result in the Southeast work center.

*ii) SAIFI Result by Work Center*

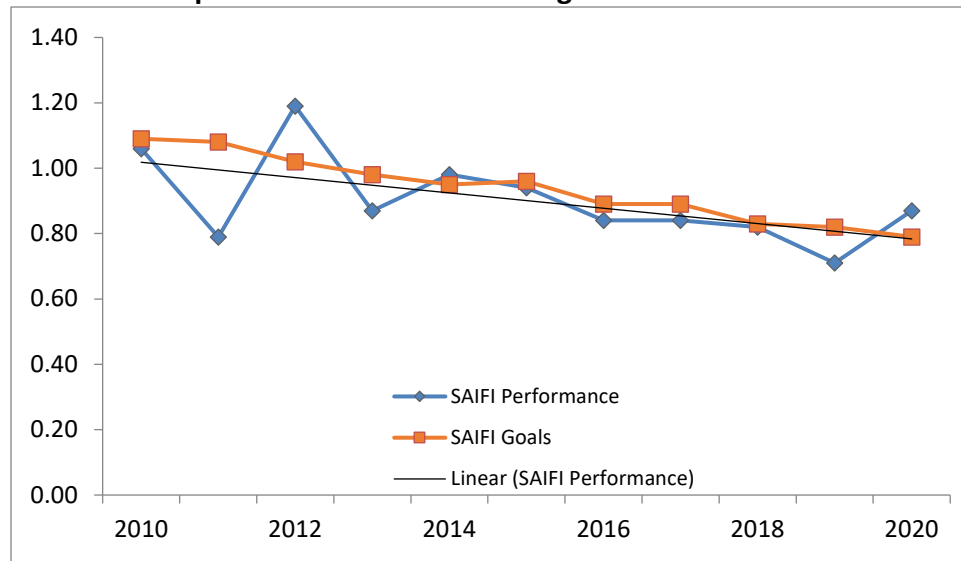
Graphs 5 through 8 summarize Xcel's reliability results for the SAIFI metric for its four different work centers.

**Graph 5 – Metro East SAIFI Regression 2010 – 2020**



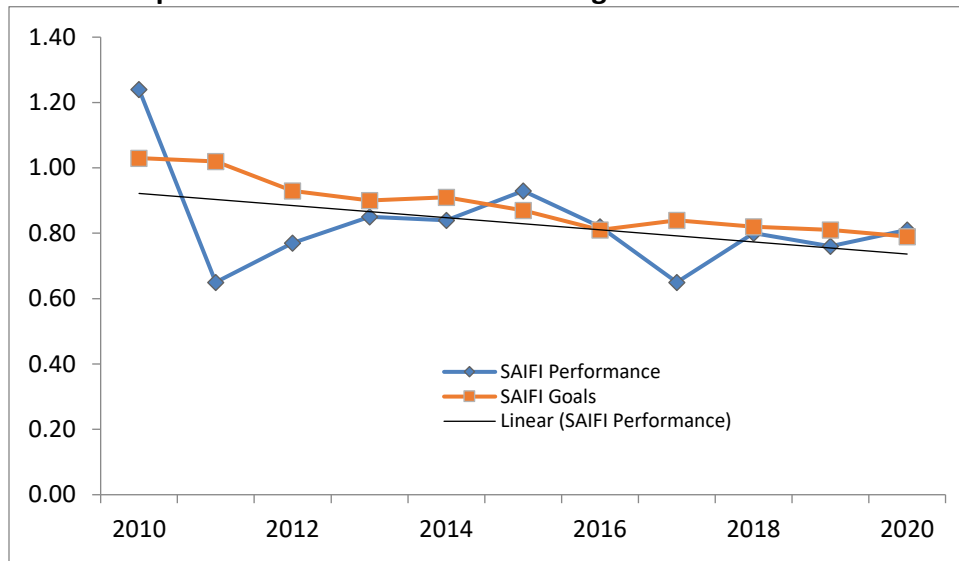
The SAIFI results for the Metro East work center indicate that SAIFI performance is improving as the slope of the linear function is negative.

**Graph 6 – Metro West SAIFI Regression 2010 – 2020**



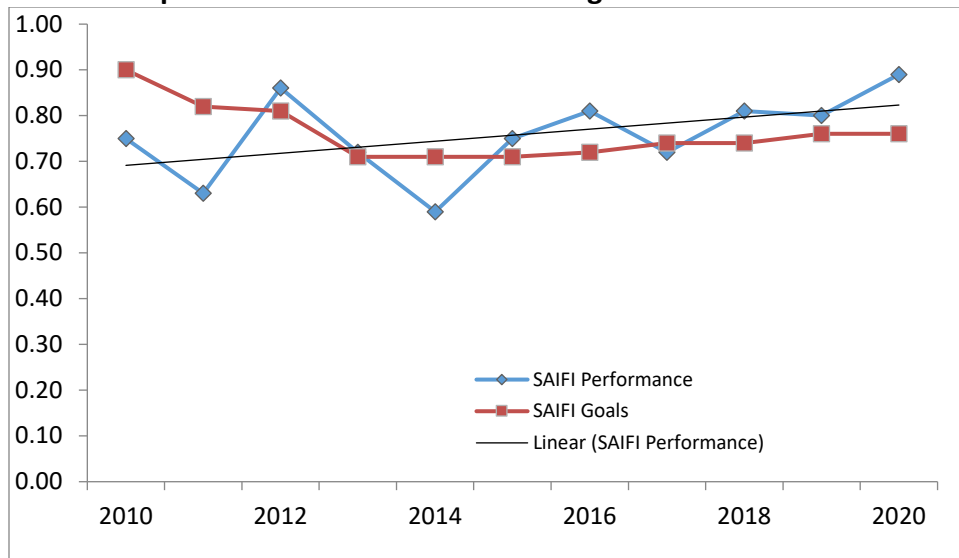
The SAIFI results for the Metro West work center indicate that SAIFI performance is improving as the slope of the linear function is negative.

**Graph 7 – Metro Northwest SAIFI Regression 2010 – 2020**



The SAIFI results for the Metro Northwest work center indicate that SAIFI performance is also improving as the slope of the linear function is negative.

**Graph 8 – Metro Southeast SAIFI Regression 2010 – 2020**

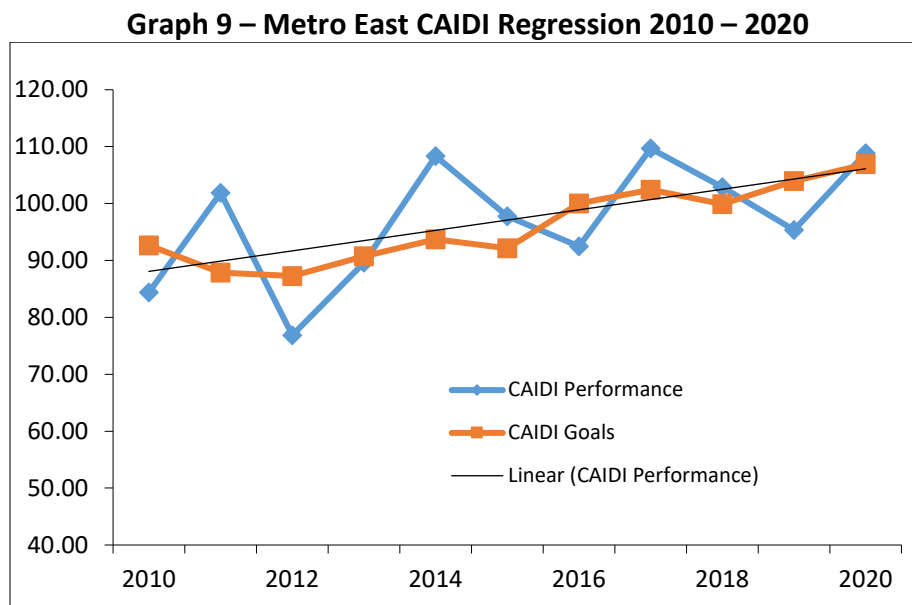


The SAIFI results for the Southeast work center suggest that performance relative to this reliability metric has not improved over the past decade. The slope of the linear function is slightly positive.

In summary, SAIFI performance by work center over the past decade suggests improvement to the metric in the Metro West, Metro Northwest and Metro East work centers, and a worsening result in the Southeast work center.

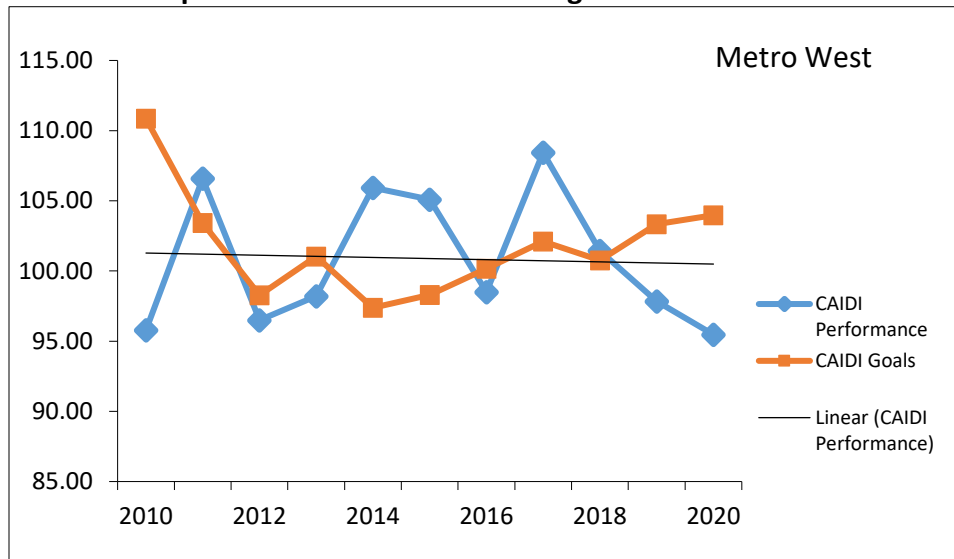
*iii) CAIDI Result by Work Center*

Graphs 9 through 12 summarize Xcel's reliability results for the CAIDI metric for its four different work centers over the past decade. CAIDI performance is a bit more complicated to analyze given that it is calculated as the ratio between SAIDI and SAIFI. As such, the information in these four graphs should be discounted to some extent relative to the SAIDI and SAIFI results. That said, the Department includes this information to provide the Commission with complete information.



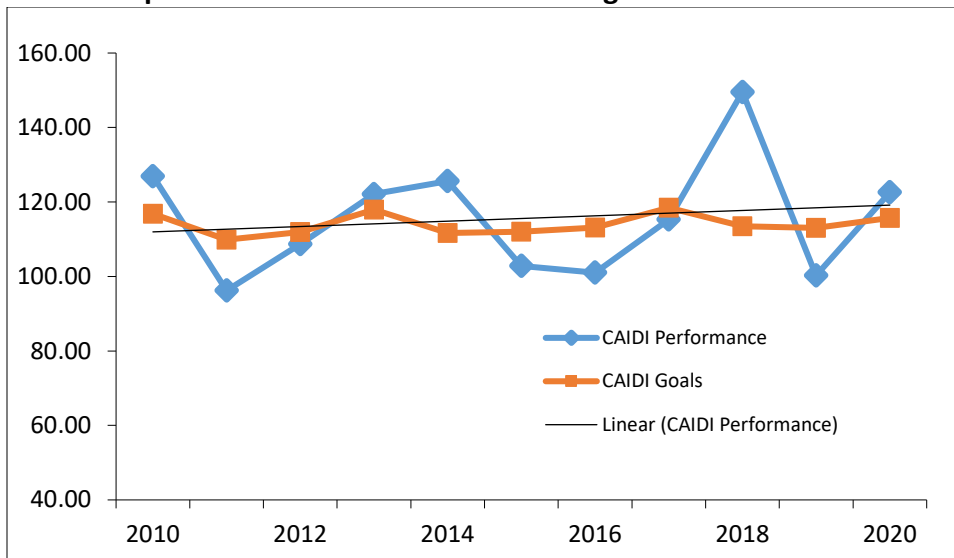
The CAIDI results for the Metro East work center indicate that the average time a customer is out of service has increased slightly since 2010 as the slope of the linear function is positive.

**Graph 10 – Metro West CAIDI Regression 2010 – 2020**



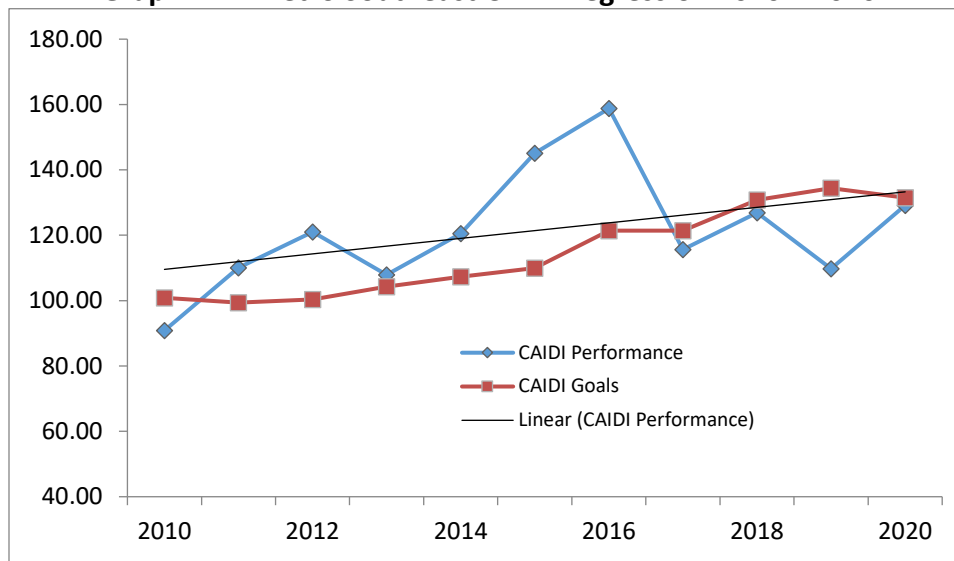
The CAIDI results for the Metro West work center indicate that it has decreased slightly since 2010 as the slope of the linear function appears to be very slightly negative.

**Graph 11 – Metro Northwest CAIDI Regression 2010 – 2020**



The CAIDI results for the Northwest work center indicate that it has increased slightly since 2010 as the slope of the linear function is slightly positive.

**Graph 12 – Metro Southeast CAIDI Regression 2010 – 2020**



The CAIDI results for the Southeast work center indicate that the CAIDI has increased slightly since 2010 as the slope of the linear function appears to be very slightly positive.

CAIDI performance by work center over the past decade suggests improvement to the metric in the Metro West work center, and potentially mixed results in the three remaining work centers.

Table 1 summarizes the regression analysis.

**Table 1 – Reliability Regression Results by Work Center by Metric 2010 -2020\***

Work Center	SAIDI	SAIFI	CAIDI
Metro East	Neither	Decreasing	Increasing
Metro West	Decreasing	Decreasing	Decreasing
Northwest	Decreasing	Decreasing	Increasing
<i>Southeast</i>	<i>Increasing</i>	<i>Increasing</i>	<i>Increasing</i>

\*Decreasing values for these metrics represent improving service reliability.

The top performing work center according to this analysis is Metro West. All three of its reliability metrics declined during the ten-year period. The Northwest work center also had pretty good results, both SAIDI and SAIFI declined, while the more indeterminate CAIDI increased. The Metro East work center had middling results – SAIDI was flat, SAIFI decreased and CAIDI increased. The Southeast work center had the worst results. All three reliability metrics increased during the 10-year period.

While it is difficult to identify clear long-term trends in a system as complex as an electric distribution system, this analysis’ results are consistent with the Department’s general conclusions regarding Xcel’s distribution system’s reliability over the past several years. The Commission has recognized that the reliability metrics for the Southeast work center have been problematic for some time and have



required the Company to provide additional quarterly reporting on its progress in improving that work center's operations for some time.

This combination of the results of the regression analysis and the regulatory agencies observations over the past several years suggests that the "business as usual" approach the Department has historically recommended is inadequate in terms of prompting Xcel to dedicate the resources necessary to improve customer reliability metrics associated with its Southeast work center.

Thus, the Department began considering other avenues for improving customer reliability for electric customers located in that work center. The simplest alternative from the Department's perspective would be for Xcel to rationalize the service territory served by the Southeast work center by selling some portions of it to neighboring electric utilities. A paragraph in Attachment C in Xcel's 2020 SQSR at page 9 prompted this thought:

The Southeast work center is geographically our largest work center, spanning from portions of Yellow Medicine county – about 30 miles from the Minnesota- South Dakota border – on the west to the Minnesota-Wisconsin border on the east. The largest service center is Mankato, stretching 120 miles from Jordan on the northeast to Bergen on the southwest. Depending on the location of the outage, the time of day, and the distance travelled by the first responder it could take over two hours for the first responder to arrive at the outage location and then additional time to restore service. [Emphasis added].

While the actual instances of a first responder driving for two hours to respond to an outage are undoubtedly rare, the distances associated with the Southeast work center suggest that rationalizing the service territory served might improve system reliability.

Department information request no. 5 asked if the Company has "ever analyzed the potential of modifying by selling a portion of its more rural service territory to improve system reliability. The Company responded that it had not considered selling a portion of its more rural service territory to improve system reliability.<sup>3</sup>

Xcel further explained:

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<sup>3</sup> See Attachment A.

Although the reliability in more rural areas has not been as good as urban area, we are committed to improving the reliability in these areas. The Southeast area typically performs in the second quartile for SAIDI and the first quartile for SAIFI (Graphs 27 and 28); while the CAIDI measure (Graph 29) jumps around from low second quartile to high fourth quartile.

The Department inferred from the Company's response that it was referring to Graphs 27 through 29 on pages 95 through 97 of the filing. Xcel's statement appears to be consistent with the information provided for the period from 2016 through 2020.

That said, the Department recommends that the Commission order Xcel to perform an analysis that attempts to model the effects of selling so portion of the rural service territory contained in the Company's Southeast work center on that work center's reliability metrics in its 2021 SQSR filing.<sup>4</sup>

## **Section B – Annual Safety Report Review under Commission Rules**

The Department reviewed Xcel's 2020 Report to assess compliance with Minnesota Rules Chapter 7826, including trends in Xcel's performance.

The annual safety report consists of two parts:<sup>6</sup>

- A. a summary of all reports filed with the United States Occupational Safety and Health Administration [OSHA] and the Occupational Safety and Health Division of the Minnesota Department of Labor and Industry (OSHD) during the calendar year; and
- B. a description of all incidents during the calendar year in which an injury requiring medical attention or property damage resulting in compensation occurred as a result of downed wires or other electrical system failures and all remedial action taken as a result of any injuries or property damage described.

Xcel provided summaries of 2020 data requested by the U.S. Department of Labor. This information reflects safety information on a random selection of the Company's plants and is therefore not necessarily comparable year to year.

Table 2 below summarizes Xcel's most recent and past reports regarding property damage claims.<sup>5</sup>

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<sup>4</sup> The intent of the Department's suggestion is not simply to remove declining metrics from the report, but to identify ways that the affected customers may receive improved service. An alternative is for Xcel to devote additional staffing resources to this area if cost effective.

<sup>5</sup> Department's calculation based on data provided in Attachment A of the Report.

**Table 2: Property Damage Reimbursement**

Year	Claims	Total Amount Paid
2011	128	\$356,107.39
2012	88	\$135,836.53
2013	110	\$184,083.70
2014	92	\$137,610.16
2015	90	\$185,584.32
2016	47	\$111,289.98
2017	50	\$135,844.06
2018	79	\$147,754.08
2019	81	\$1,203,379.30
2020	66	\$274,049

The number of claims in 2020 decreased from 2019 (66 versus 81). The amount paid in claims in 2020 decreased significantly from \$1,203,379.30 from to \$274,049. While still higher than the claims paid from 2012 through 2018, this annual amount appears to be somewhat more in line with prior years. The amount paid in 2019 was unusually high due to three large claims paid that year.

## **Section B – Annual Reliability Report Review under Commission Rules**

Minnesota Rules, part 7826.0500 requires each utility to file an annual report that includes the following information: <sup>6</sup>

1. Standards Institute standards (subpart 1.I),
2. Reliability performance (subpart 1.A, 1.B and 1.C),
3. Storm-normalization method (subpart 1.D),
4. Action plan for remedying any failure to comply with reliability goals (subpart 1.E),
5. Bulk power supply interruptions (subpart 1.F),
6. Major Service Interruptions (subpart 1.G),
7. Circuit interruption data (subpart 1.H),
8. Known instances in which nominal voltages did not meet American National Standards Institute standards (subpart 1.I),
9. Work center staffing levels (subpart 1.J),
10. Any other relevant information (subpart 1.K).

Minnesota Rules part 7826.0600 requires each utility to file proposed reliability standards in the form of numerical values for the SAIDI, SAIFI, and CAIDI for each of its work centers.

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<sup>6</sup> Minnesota Rules, part 7826.0500, available at: <https://www.revisor.mn.gov/rules/?id=7826.0500>

### 1. Reliability Performance

Xcel provided a table comparing its 2020 reliability performance with the goals the Commission set in Docket No. E002/M-20-406.<sup>7</sup> The Company noted that it met three of the Commission's twelve reliability goals (33 percent) identified in the Commission's Order dated January 28, 2020.

Table 3 below reflects the information provided by Xcel reflecting use of the IEEE 1366 storm normalization method.

**Table 3: Xcel's 2019 Reliability Performance Compared with Goals**

Work Center		2020 Actuals	2020 Goals
Metro East	SAIDI	<b>104.98</b>	89.95
	SAIFI	<b>1.01</b>	0.84
	CAIDI	103.69	106.91
Metro West	SAIDI	<b>88.82</b>	79.37
	SAIFI	<b>1.00</b>	0.79
	CAIDI	88.53	100.55
Northwest	SAIDI	<b>121.94</b>	87.11
	SAIFI	<b>0.93</b>	0.72
	CAIDI	<b>130.98</b>	115.72
Southeast	SAIDI	<b>105.07</b>	94.82
	SAIFI	<b>0.87</b>	0.76
	CAIDI	120.29	122.04

The numbers in bold in Table 3 indicate performance that did not meet its respective goal. Xcel provided significant additional detailed information in this year's filing regarding the top causes of customer interruptions, impact events and days for the transmission and distribution system and moderate storm activity by work center. The Department addresses Xcel's proposed action plan to improve reliability below.

Table 4 below shows Xcel's performance over the ten-year period of 2010 to 2019 under the Institute of Electrical and Electronics Engineers (IEEE) 2.5 beta method outlined in the IEEE publication 13666-2012.

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<sup>7</sup> The reliability indices (CAIDI = Customer Average Interruption Duration Index, SAIDI = System Average Interruption Duration Index, and SAIFI = System Average Interruption Frequency Index) used in this section are defined under Minnesota Rules, part 7826.0200, subparts 4, 10 and 11, available at [https://www/revisor.mn.gov/rules/?id=7826.0200](https://www.revisor.mn.gov/rules/?id=7826.0200)

**Table 4: IEEE 1366 Performance 2013-2020**

Work Center	Reliability Metric	Year							
		2013	2014	2015	2016	2017	2018	2019	2020
MetroEast	SAIDI	85.05	79.73	93.73	95.52	76.22	103.99	80.56	104.98
	SAIFI	0.86	0.86	0.90	0.87	0.76	0.93	0.75	1.01
	CAIDI	99.33	92.46	104.25	109.70	109.70	111.74	107.36	103.69
MetroWest	SAIDI	101.41	83.02	90.95	83.64	69.51	83.26	69.50	88.82
	SAIFI	0.96	0.84	0.84	0.82	0.71	0.87	0.70	1.00
	CAIDI	105.45	98.50	108.44	101.43	97.84	95.47	99.15	88.53
Northwest	SAIDI	97.43	82.80	75.58	85.81	75.77	109.34	89.07	121.94
	SAIFI	0.94	0.82	0.66	0.70	0.76	0.87	0.78	0.93
	CAIDI	103.70	101.02	115.39	122.38	100.28	126.05	113.48	130.98
Southeast	SAIDI	87.98	103.45	86.51	110.23	96.33	118.80	129.10	105.07
	SAIFI	0.73	0.80	0.75	0.85	0.84	0.92	0.93	0.87
	CAIDI	120.39	129.20	115.16	130.02	114.73	129.64	138.99	120.29

The Department acknowledges Xcel’s fulfillment of the requirements of Minnesota Rules, part 7826.0500, subparts 1.A, 1.B and 1.C.

## 2. Storm-Normalization Method

As noted above, the Company stated that it used the IEEE 1366 storm day threshold calculation procedures for its 2020 data. Using the previous five years of outage history for each region, Xcel identified the storm day threshold by:

- calculating the daily SAIDI.
- calculating the Natural Log of each daily SAIDI, and
- calculating the average and standard deviation of the natural logs.

A Major Event Day (MED) is one in which the outages met or exceeded the storm-day threshold. Xcel ~~reported~~ that its reliability data is normalized to account for major storms by removing outages that start on an MED.

The Department acknowledges Xcel’s fulfillment of the requirements of Minnesota Rules, part 7826.0500, subp. 1.D.

## 3. Action Plan to Improve Reliability

As shown and noted in Table 2 above, Xcel met 33 percent or three of its twelve goals in its work centers in 2020. Xcel repeated its assertion that by setting the standards on a rolling five-year average, the Company expects to achieve its target results 50 percent of the time and to miss the target 50

percent of the time. The Company also noted that it had met 50 percent of its goals on average over the past five years.<sup>8</sup>

Xcel provided a lengthy and detailed reliability analysis for each of the four work centers that reviewed:

- actual annual reliability factors by workcenter for the past five years.
- the top causes of customer interruptions in 2020.
- the incremental change in those different customer interruption drivers, and
- an analysis of the different events and days that caused customer interruptions as well as the type of equipment that was failed.

Attachment C of Xcel's filing reported on Xcel's Southeast Work Center related to staffing and reliability. Attachment D of the filing included a description of Xcel's distribution system process.

The information in Attachment C discussed the Company's efforts to improve system reliability in that troubled workcenter, whereas Attachment D provided a broader perspective on Xcel's efforts to proactively manage its distribution network. Xcel's report on the Southeast center indicates that the geographical area spans almost across southern Minnesota, "spanning from nearly the border with South Dakota on the west to the border with Wisconsin on the east."

The Company has also committed to providing quarterly reports to the Commission on the reliability metrics for the Southeast Work Center through the end of 2021.

The Department acknowledges Xcel's fulfillment of the requirements of Minnesota Rules, part 7826.0500, subp. 1.E. The Department provides some additional analysis in this docket regarding long-term trends for reliability metrics in the Southeast work center that suggest that the Company's efforts are not providing similar results to its efforts in its other work centers. As a result, the Department is recommending that the Company perform some additional analysis to determine if it could improve reliability in the Southeast work center.

#### *4. Bulk Power Supply Interruptions*

Xcel reported that there were no generation outages on the Company's system that caused an interruption of service to firm electric customers in 2020. Xcel provided a table listing interruptions caused by transmission outages.<sup>9</sup> The table identifies the transmission line, date, time, duration, reasons for the interruption, comments, and remedial steps taken or planned.

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<sup>8</sup> Petition at page 22.

<sup>9</sup> See Attachment F of the filing.

The Department acknowledges Xcel's fulfillment of the requirements of Minnesota Rules, part 7826.0500, subp. 1.F.

#### *5. Major Service Interruptions*

Minnesota Rules, part 7826.0500, subp. 1.G. requires an electric utility to provide a "copy of each report filed under part 7826.0700." Minn. R. 7826.0700 requires an electric utility to "promptly information the commission's Consumer Affairs Office (CAO) of any major service interruption occurring on the utility's system with certain information."

The Commission's Order dated December 18, 2020 on Docket No. E002/M-20-406 varied the requirement in Minnesota Rules, part 7826.0500, subp. 1.G and order Xcel to file a summary table in an attachment.<sup>10</sup>

Xcel reported that, in 2020, there were 264 outages on its system that met the definition of "major service interruption." The Company only had 219 of these types of outages in 2020. Table 5 below shows the number of outages not reported to the CAO and the total number of major service interruptions reported by Xcel.

**Table 5: Major Service Interruptions Not Reported to the  
Minnesota Public Utilities Commission's Consumer Affairs Office**

<b>Year</b>	<b>Unreported Major Service Interruptions</b>	<b>Number of Major Service Interruptions</b>	<b>Percent Unreported</b>
2006	51	196	26%
2007	23	373	6%
2008	41	288	14%
2009	6	164	4%
2010	15	351	4%
2011	4	214	2%
2012	5	252	2%
2013	2	605	<1%
2014	11	233	5%
2015	27	259	10%
2016	12	310	4%
2017	6	154	4%
2018	6	243	2%
2019	5	214	2%
2020	9	264	3%

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<sup>10</sup> See Attachment G of the filing.

The Company noted that each of the nine unreported major service interruptions were due to human error.

Xcel reported that there were no major service interruptions in which ten percent or more of its Minnesota customers were without service for 24 hours or more in 2020.

The Department acknowledges Xcel's fulfillment of the requirements of Minnesota Rules, part 7826.0700.

#### *6. Worst Performing Circuit*

Attachment E to the filing provides information regarding this requirement. Historically, Xcel defined poor performing feeders as those with a System Average Interruption Frequency Index (SAIFI) exceeding three times the average feeder SAIFI value for the Company's Minnesota system or a SAIDI exceeding four times the average feeder SAIDI value. SAIDI and SAIFI were based on non-storm-normalized data and did not include planned outages or outages caused by public damage.

The Company changed its method this year in response to requests from Commission Staff to use calendar year data and a certain format. The Company also identified five feeders by work center that need improvements. Xcel also provided that information in Attachment E.

The Department acknowledges Xcel's fulfillment of the requirements of Minnesota Rules, part 7826.0500, subp. 1.H.

#### *7. Compliance with ANSI Voltage Standards*

Xcel reported that it conducted 212 voltage investigations in 2020. After investigation, approximately 17 percent of these instances were found to be caused by a specific voltage problem. In cases where the Company finds that the voltage is not within the acceptable range, actions are taken such as swapping transformers, upgrading transformers, or checking capacitor banks.

The Department acknowledges Xcel's fulfillment of the requirements of Minnesota Rules, part 7826.0500, subp. 1.I.

#### *8. Work Center Staffing Levels*

Xcel reported its 2020 staffing levels by work center. Table 6 below contains the Company's staffing levels for the past ten years.<sup>17</sup>



**Table 6: Xcel's Historical Work Center Staffing Levels**

Year	Metro East	Metro West	Northwest	Southeast	Other	Total
2010	131	170	32	52	38	423
2011	135	174	31	52	37	429
2012	131	169	32	51	37	420
2013	128	173	32	53	41	427
2014	126	176	33	53	46	434
2015	128	179	33	51	45	436
2016	124	184	30	47	46	431
2017	119	176	31	46	46	418
2018	124	180	32	49	47	432
2019	123	177	30	49	45	424
2020	125	181	31	49	49	435

Xcel also provided the number of contractors working in each work center in a table on page 53 in compliance with the Commission's January 28, 2020 Order in Docket No. E002/M-19-261. The Company stated that it had a limited augmentation to Trouble and Operations and Maintenance staff due to a 2020 reorganization. The number of contractors appears to have declined slightly in 2020 compared to 2019.

The Department acknowledges Xcel's fulfillment of the requirements of Minnesota Rules, part 7826.0500, subp. 1.J.

#### *9. Proposed 2021 Standards for SAIFI, SAIDI and CAIDI*

Xcel noted in its filing that the Commission ordered the Company to transition to a different approach to calculating SAIDI, SAIFI and CAIDI in its Order in Xcel's 2020 SQSR. This new approach involves using the IEEE Distribution Reliability Working Group survey to benchmark Xcel's performance for setting the reliability standards listed in Minn. Rule 7826.0600, subpart 1.

The Company is proposing to continue to use the four work centers it currently uses:

- Metro East.
- Metro West.
- Northwest; and
- Southeast.

Xcel will identify reliability standards for each work center. For the Metro East and Metro West the Company is proposing better than the 2<sup>nd</sup> quartile of the IEEE benchmark for large utilities. For the Northwest and Southeast work centers, Xcel is proposing performance better than second quartile for medium sized utilities using the IEEE benchmark. The Company provided a series of graphs in the

petition that illustrates where the different work center reliability results for the most recent five years are provided as well as a comparison to the corresponding proposed IEEE standard. The specific reliability standards by work center will be calculated later this year once the Company has received additional information from IEEE.

The Department recommended that the Commission require Xcel to meet first quartile standards in its comments in the Company's 2020 SQSR (Docket No. 20-406) if the Commission agreed that a transition to a full benchmarking approach was appropriate. The Department's reasoning for this recommendation was that Xcel should be held to a high standard regarding reliability as that is probably the most important aspect of electric service from an average ratepayer's perspective.

The Commission did not accept that Department recommendation. Given that the Company is transitioning to the new approach this year, the Department will not oppose Xcel's proposed 2<sup>nd</sup> quartile reliability standards for 2021.

#### **Section D –Reliability Reporting Requirements Included by Commission Order**

By the Department's count, the Commission has identified over 20 additional reporting requirements relative to Xcel's service reliability in its Orders. The different requirements are organized by topic, like Xcel's 2020 filing. The Department has also included a table identifying requirements by Rule and Order and the section where each requirement is covered in Attachments B and C.

##### *1. Customer Service Quality and Reliability Metrics Infographic*

Two Commission Orders discuss this infographic requirement.<sup>11</sup> The Company provided a copy of said infographic in Attachment B.

The Department's review of that infographic notes that the reliability information is relegated to the second page of the document. That placement seems counterintuitive given the document's purpose.

The Department recommends the Company re-format the document with a narrower focus on customer service and reliability. For example, the Department suggests that Xcel remove the sections about Xcel Energy Minnesota and Enhancing the Customer Experience. The information in the first section is not relevant to topic. The information in the second section is marginally relevant to ratepayers interested in the Company's reliability and customer service performance. The information in the section titled "Our Commitment to Reliability" is adequate as is the information included on the second page of the document.

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<sup>11</sup> Order Point 2 in the Commission's May 14, 2019 Order in Docket No. E002/M-18-239 and Order Point 12 in the January 28, 2020 Order in Docket No. E002/M-19-261 requires this infographic.

The Department recommends that Xcel include comparisons of 1) its actual reliability performance to the Commission's goals for the previous year; 2) the number of customer complaints compared to a five-year average; and 3) contact information for the Commission's Consumers Affairs Office in case a customer has questions or a complaint in the space that would be available if the first two sections of the current infographic are removed.

## 2. Description of Policies to Assure Reliability and Discussion of Leading Causes of Outages

Two Commission Orders discuss these requirements.<sup>12</sup> The Company provided information consistent with these requirements in Attachment D.

The information Xcel provided was informative regarding the Company's efforts in these areas. The Department recreated portions of Table 1 from Attachment D below to determine how expenditures for the different programs changed over the three-year period covered by the table.

**Table 7: Total and Average Expenditures from Table 1 of Attachment D**

Line No.	Description	Actual Expenditures (\$000)			Avg
		2018	2019	2020	
1.	Feeder Perf. Improvement	\$ 1,451	\$ 1,138	<b>\$ 1,011</b>	\$ 1,200
2.	Outage Exception Reporting Tool	\$ 490	\$ 292	<b>\$ 143</b>	\$ 308
3.	UG Mainline Cable Replacement	\$ 1,930	\$ 2,557	<b>\$ 1,719</b>	\$ 2,069
4.	UG Tap Cable	\$ 19,593	\$ 15,019	\$ 26,470	\$ 20,361
5.	Automated Switches Install	\$ -	\$ -	\$ 65	\$ 22
6.	OH Feeder Infrared Eval.	\$ 58	\$ 40	\$ 40	\$ 46
7.	T&D Veg Managemet	\$ 29,352	\$ 31,963	<b>\$ 20,633</b>	\$ 27,316
8.	Transmission Program Replace	\$ 229	\$ 1,444	\$ 3,764	\$ 1,812
9.	Dist.Pole Inspect & Replace	\$ 11,035	\$ 20,500	\$ 28,285	\$ 19,940
10.	Transmission Substation	\$ 9,228	\$ 5,759	<b>\$ 2,863</b>	\$ 5,950
11.	Transmission ELR Work	\$ 2,834	\$ 5,303	<b>\$ 2,239</b>	\$ 3,459
12.	Total	\$ 78,218	\$ 86,034	\$ 89,252	

Projects whose 2020 actual expenditures were below the three-year average expenditure are highlighted in Table 6. The Department is pleased to note that expenditures for the 11 projects listed increased over the three-year period. While the decreases associated with several of those projects appear reasonable, the Department asks that Xcel explain in its Reply Comments why its 2020 expenditures for Vegetation Management declined by \$11.4 million (\$32.0 – \$20.6 = \$11.4 million) or

<sup>12</sup> Order Point 2 in the Commission's December 12, 2014 Order in Docket No. E002/M-14-131 required Xcel to provide additional information regarding "policies, procedures and actions that it has implemented, and plans to implement, to assure reliability, including information on how it is demonstrating pro-active management of the system as a whole, increased reliability and active contingency planning." Order Point 3.1 in the Commission's Order in Docket No. E002/M-18-239 required additional discussion regarding the leading causes of outages and mitigation strategies.

36 percent from 2019 to 2020. The Department also notes that the Company did not provide much context regarding its process for identifying those eleven projects or the breakdown of the expenditures between capital and operations and maintenance.

### *3. IEEE Benchmarking 2020 Supplemental Filing*

Order Point 11 in the Commission's December 18, 2020 Order in Docket No. E002/M-20-406 describes this requirement. The Company committed to providing this information in its filing.

The Department concludes that Xcel has complied with this requirement to the extent possible at this time.

### *4. Reporting Granularity – Reliability Metrics*

Xcel provided this information in two maps located on pages 9 and 10 of the report. The Company color coded four SAIDI ranges to provide the additional granularity and used a Commission approved method for calculating SAIDI.

The Department concludes that Xcel has complied with this requirement.

### *5. SAIDI, SAIFI and CAIDI Additional Information*

Order Point 4 in the Commission's December 12, 2014 Order in Docket No. E002/M-14-131 required the Company to "incorporate into its next filing a summary table that allows the reader to more easily assess the overall reliability of the system and identify the main factors that affect reliability."

Order Points 1 and 2 from Attachment B of the Commission's January 28, 2020 Order in Docket No. E002/M-20-406 stated that Xcel should provide non-normalized and normalized values for reliability metrics and that the Company should use the IEEE 1366 method for the calculation.

Xcel provided information that appears to fulfill the first three of these requirements in its Table 3 at page 11 of the Report. The Company reported "Historical Reliability & Storm Day Exclusions" calculated according to three different approaches – 1) All Days, 2) Minnesota Quality of Service Tariff methodology; and 3) Annual Rules methodology. In addition, the Company provided a graph that delineated the major causes of outages in 2020 for its entire Minnesota service territory as well as by work center. This information appears responsive to the second requirement listed above. Table 8 below shows these data for the previous five years.

**Table 8: Non-normalized SAIDI, SAIFI and CAIDI**

		2016	2017	2018	2019	2020
Metro East	SAIDI	223.67	136.51	112.11	104.57	124.02
	SAIFI	1.08	0.95	0.96	0.85	1.07
	CAIDI	206.85	144.37	116.71	122.52	115.72
Metro West	SAIDI	198.25	148.58	88.23	79.92	143.84
	SAIFI	1.00	0.86	0.92	0.74	1.13
	CAIDI	198.86	173.27	95.70	107.38	127.72
Northwest	SAIDI	225.74	173.71	109.50	150.82	133.55
	SAIFI	1.07	0.98	0.87	0.94	0.98
	CAIDI	211.50	177.46	126.02	160.71	135.77
Southeast	SAIDI	249.05	96.37	353.32	374.19	122.43
	SAIFI	1.15	0.84	1.15	1.32	0.92
	CAIDI	217.15	114.75	307.95	283.40	132.38

Table 9 provides the SAIDI, SAIFI and CAIDI values calculated using the IEEE 2.5 beta method for the previous five years.<sup>13</sup>

**Table 9: 1366 Normalized SAIDI, SAIFI, and CAIDI**

		2016	2017	2018	2019	2020
Metro East	SAIDI	95.52	76.22	103.69	80.56	104.98
	SAIFI	0.87	0.76	0.93	0.75	1.01
	CAIDI	109.70	100.48	111.74	107.36	103.69
Metro West	SAIDI	83.64	69.51	83.26	69.50	88.82
	SAIFI	0.82	0.71	0.87	0.70	1.00
	CAIDI	101.43	97.84	95.47	99.15	88.53
Northwest	SAIDI	85.81	75.77	109.34	89.07	121.94
	SAIFI	0.70	0.76	0.87	0.78	0.93
	CAIDI	122.38	100.28	126.05	113.48	130.98
Southeast	SAIDI	110.23	96.33	118.80	129.10	105.07
	SAIFI	0.85	0.84	0.92	0.93	0.87
	CAIDI	130.02	114.73	129.64	138.99	120.29

The Department concludes that Xcel met these reporting requirements.

#### *6. Reliability Metrics by Customer Class*

Order Point 11 on Attachment B of the Commission’s January 28, 2020 Order in Docket No. E002/M-19-261 requires the Company to provide reliability metrics by customer class or if that information is not available, a timeline by which the Company will be able to provide such data.

<sup>13</sup> Report at page 11.

The Company provided customer class information along with the reliability data by feeder in **TRADE SECRET** Attachment M<sup>14</sup>. Xcel stated that it is not able to provide an overall SAIDI by customer class at this time.

The Department concludes that Xcel met the requirement and provided reasonable information regarding differences in providing service to commercial and residential customers. As a result, the Department believes the Company fulfilled this reporting requirement.

#### *7. IEEE Benchmarking for SAIDI, SAIFI, and CAIDI*

Order Point 10 in Attachment B in the Commission's January 28, 2020 Order in Docket No. E002/M-19-261 requires the Company to provide "IEEE Benchmarking Results for SAIDI, SAIFI, CAIDI and MAIFI from the IEEE benchmarking working group."

Xcel provided this information in a series of 3 graphs that compared the NSP-Minnesota operating company's results from 2016 through 2019 to the IEEE DRWG Benchmark for the Large Utilities Group > 1 million customers). Graph 2 provided NSPM's SAIDI. Graph 3 provided the same information for NSPM SAIFI. Graph 4 provided the same information for CAIDI. This information was provided in the Report at pages 17 through 19.

For SAIDI, NSPM's annual results fluctuated between the second and third quartiles. The SAIFI results were slightly better for the same period. The CAIDI results were like the SAIFI results. The Company also noted that once the 2020 IEEE Distribution Reliability Working Group information is available, it will update these graphs.

The Department concludes that Xcel met the requirement to the extent possible in this iteration of its filing.

#### *8. Grid Modernization Investments and SAIDI, SAIFI and CAIDI Analysis*

Order Point 5 of the Commission's December 18, 2020 Order in Docket No. E002/M-20-406 requests that Xcel file an analysis that compares reliability metrics for feeders with grid modernization efforts and those without.

The Company is in the process of installing and testing this new equipment, Fault Location Isolation and Service Restoration (FLISR) for example. Xcel hopes to provide the first results of this analysis at the end of 2022.

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<sup>14</sup> **Trade Secret** Attachment M also included the information required in revised Attachment A of the Commission's December 18, 2020 Order in Docket No. E002/M-20-406.

The Department concludes that Xcel met the requirement to the extent possible.

#### *9. Sustained Outage Analysis*

Order Point 12 from Attachment B of the Commission's January 28, 2020 Order in Docket No. E002/M-19-261 requires the Company to provide the causes of sustained outages, by work center.

As noted in our review of the requirements in Minn. Rule 7826.0500, subpart 1.E, the Company provided a lengthy detailed analysis to help to provide some context as to why certain work centers have worse results than the Commission's SAIDI, SAIFI and CAIDI standards.

The Department concludes that Xcel has complied with this requirement.

#### *10. Southeast Work Center Reporting*

Order Point 3 of the Commission's December 18, 2020 Order in Docket No. E002/M-20-406 requires the Company to continue filing quarterly status reports on efforts to improve reliability in the Southeast Work Center through fourth quarter 2021.

The Company included its most recent quarterly report on this topic in the filing.

The Department acknowledges Xcel's fulfillment of the requirements listed in the Order.

#### *11. Worst Performing Feeders by Work Center*

In the Commission's April 7, 2006 Order in Docket No. E002/M-05-551, the Commission increased the number of feeders that the Company includes in this portion of the report to 25 per work center, for a total of 100. The Commission's April 8, 2006 Order also directed by the Company to work with Commission Staff on the format of the Worst Performing Feeder portion of the Annual Report.

The Company provided this information in Attachment E of the Report. It appears Xcel provided the required information and thus complied with the Commission's requirement.

#### *12. Minnesota Public Utilities Commission's Consumer Affairs Office Outage Communication*

Order Point 4 of the Commission's December 18, 2020 Order in Docket No. E002/M-20-406 granted a variance to Minn. R. 7826.0500, subp. 1, item G and requires the Company a summary table that includes the information contained in the reports similar to Attachment G of Xcel's filing.

The Company provided this information in Attachment G of the filing.<sup>15</sup>

The Department reviewed the requirements included in the applicable rule in the previous section of these comments and noted that Xcel had fulfilled those requirements. The Department also concludes that Xcel has fulfilled the requirement included in the Commission's Order.

### *13. Outage Communications to Customers*

Order Point 3.D in the Commission's February 9, 2018 Order in Dockets Nos. E002/M-16-281 and E002/M-17-249 requires the Company to provide "[a] summary of the Company's estimated response time to customers and steps the Company is taking to measure and communicate more accurately the Company's estimated response time to customers. The Company has agreed to provide summary ERT data on a going-forward basis as part of these Annual reports and proposed the data would be summarized as to the accuracy of our ERT estimates for the calendar year."

Order Point 2 (Attachment B, item 9) in the January 28, 2020 Order in Docket No. E002/M-19- 261 also requires the Company to provide the estimated restoration time accuracy from 0 to +30 minute window.

The Company discussed estimated restoration times (ERTs) and the Company's measurement efforts, along with communication it has provided to its customers.<sup>16</sup>

Table 10 below shows the Company's performance related to its ERTs over the past three years.

**Table 10: ERT Accuracy – Within -90 to +0 Minutes**

Entity	2015	2016	2017	2018	2019	2020
NSPM	44.8%	45.9%	43.5%	43.6%	48.3%	53.4%
MN Only	41.2%	45.7%	43.1%	43.5%	49.9%	54.3%

The Company appears to be demonstrating some improvement in this metric. Table 11 provides similar information for the +30 to +1 minute ERT window.

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<sup>15</sup> Due to an administrative error, Attachment G was mislabeled as Attachment D in Xcel's filing.

<sup>16</sup> Report at pages 49 through 52.



**Table 11: ERT Accuracy – Within +1 to +30 Minutes**

Entity	2015	2016	2017	2018	2019	2020
NSPM	5.7%	8.2%	10.1%	8.0%	10.0%	10.4%
MN Only	5.7%	8.3%	10.0%	7.5%	10.4%	10.3%

The Company appears to be demonstrating some improvement in this metric as well. The Department concludes that Xcel has complied with the Commission Order.

#### *14. Staffing*

In Order Point 8, or Attachment B in the Commission’s January 28, 2020 Order in Docket No. E002/M-19-261, the Commission required the Company to provide “separate information on the number of contractors for each work center.”

Xcel provided this information in Table 7 on page 53 of the Report.

The Department concludes that Xcel has complied with this reporting requirement.

#### *15. Momentary Average Frequency Index (MAIFI)*

In the Commission’s September 2, 2013 Order in Docket No. E002/GR-12-961 at Order Point 32 the Commission required the Company to “provide additional reporting of its currently available Momentary Average Interruption Frequency Index (MAIFI) data, such as trend lines to the extent available.”

In the Commission’s February 9, 2018 Order in Docket Nos. E002/M-16-281 and E002/M-17-249 at Order Point 3.D, the Commission required the Company to provide “[a]n assessment of MAIFI data.”

The Company provided MAIFI calculations by work center and for all of Minnesota for the 2010 through 2020 period using three different calculation protocols. These included 1) with storms, all levels all causes, 2) QSP tariff IEEE approach, no transmission outages, and 3) Annual Rules IEEE all levels.<sup>17</sup> Xcel also provided information on the MAIFI drivers by work center.

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<sup>17</sup> Report at pages 54 through 60.

Given that Xcel is not yet collecting MAIFI data for all its Minnesota customers and that its procedures for calculating MAIFI have changes over time it is probably best not to attempt to tease out trends or broad conclusions regarding the Company's efforts regarding this reliability metric at this time.

The Department concludes that Xcel has complied with these reporting requirements.

*16. Customers Experiencing Multiple Interruptions (CEMI)*

In the Commission's March 19, 2019 Order in Docket No. E002/M-18-239 at Order Point 3.c, the Commission required the Company to provide "CEMI at normalized and non-normalized outage levels of 4, 5, and 6."

Xcel provided this information in Graph 20 on page 62 of the filing. The information in that graph suggests that the Company's CEMI 4, 5, 6+ results for 2020 were worse (higher as a percentage) than the last several years. The Department will continue to monitor this situation.

The Department concludes that Xcel has complied with this reporting requirement.

In Docket No. E002/M-19-261 in Attachment B, Order Point 5, the Commission required the Company to provide "[t]he highest number of interruptions experienced by any one customer (or feeder, if customer level is not available.)"

Xcel noted that two customers experienced 12 outages and that the Company was working to resolve these customers' reliability issues.

The Department concludes that Xcel has complied with this reporting requirement.

*17. Customers Experiencing Lengthy Interruptions (CELI)*

In the Commission's March 19, 2019 Order in Docket No. E002/M-18-239 at Order Point 3.D, the Commission required the Company to provide "CELI at intervals of greater than 6 hours, 12 hours and 24 hours."

Xcel provided this information in Graphs 22 and 23 on pages 64 and 65 of the filing. The Department did not identify a trend towards improvement in Graph 22. A cursory review of Graph 23 suggested a trend towards improvement in graph.

The Company also provided information on the longest experienced interruption, consistent with the requirement included in the Commission's January 28, 2020 Order in Docket No. E002/M-19-261. Xcel noted that it had some difficulties related to incorrect data in its outage software. The lengths of the longest outages were not significantly different from past years.

The Department concludes that Xcel has complied with this reporting requirement.

## **Section E – Annual Service Quality Report by Commission Rule**

Minnesota Rules, part 7826.1300 requires each utility to file the following information on or before April 1 of each year:<sup>18</sup>

- Meter Reading Performance (7826.1400).
- Involuntary Disconnection (7826.1500).
- Service Extension Request Response Time (7826.1600).
- Call Center Response Time (7826.1700).
- Emergency Medical Accounts Status (7826.1800).
- Customer Deposits (7826.1900); and
- Customer Complaints (7826.2000).

### *1. Meter Reading Performance*

The following information is required for reporting on meter reading performance by customer class:

- A. the number and percentage of customer meters read by utility personnel.
- B. the number and percentage of customer meters self-read by customer.
- C. the number and percentage of customer meters that have not been read by utility personnel for period of 6 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 monthly meter reading staffing levels by work center or geographical area.

An annual average 99.84 percent of customer meters were read by utility personnel and 0.0006 percent were read by the customer in 2020.<sup>19</sup> This represented a slight decrease in the percentage of customer meters read by utility personnel and a very slight increase in the number of customer meters read by customers compared to 2019. These results are consistent with the difficulties the Company experienced operationally due to the COVID-19 pandemic.

Table 12 below summarizes the number of meters not read by utility personnel for 6-12 months, according to Xcel's past annual and supplemental reports.

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<sup>18</sup> The Department notes that the Company files combined electric and gas service quality metrics when appropriate (e.g., call center response time, meter reading statistics).

<sup>19</sup> The Department's calculations are based on data provided in Tables A and B, Attachment I of the Company's 2020 Report.

**Table 12: Meters Not Read for 6-12 Months 2010 - 2020<sup>20</sup>**

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	2,280	1,601	429	61	4,371
2020	1,794	953	386	13	3,146

Table 13 below summarizes the number of meters not read by utility personnel for longer than 12 months, according to Xcel's past annual and supplemental reports.

**Table 13: Meters Not Read for Longer than 12 Months 2010 – 2020<sup>21</sup>**

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	574	825	283	50	1,732
2020	773	684	371	40	1,868

Minnesota Rules, part 7826.0900, subp. 1 requires that at least 90 percent of all meters must be read during the months of April through November and at least 80 percent must be read during the months of December through March. Xcel attained those requirements in all months of 2020.

<sup>20</sup> Table C-1, Attachment I of the 2020 Report.

<sup>21</sup> Table C-2, Attachment I of the 2020 Report.

Minnesota Rules, part 7826.1400 (D) requires monthly data on meter-reading staffing levels, by work center or geographical area. Xcel provided that information by work center and stated that its current staffing levels are similar to 2019.<sup>22</sup>

The Department acknowledges Xcel's fulfillment of the requirements of Minnesota Rules, part 7826.1400 and 7826.0900.

## 2. Involuntary Disconnections

The following information is required for reporting on involuntary disconnection of service by customer class and calendar month:

- A. the number of customers who received disconnection notices.
- B. the number of customers who sought cold weather rule (CWR) protection under Minnesota Statutes, sections 216B.096 and 216B.097, and the number who were granted cold weather rule protection.
- C. the total number of customers whose service was disconnected involuntarily, and the number of these customers restored to service within 24 hours; and
- D. the number of disconnected customers restored to service by entering into a payment plan.

Table 14 below summarizes residential customer disconnection statistics reported by Xcel in its annual Report.

**Table 14: Residential Customer Involuntary Disconnection Information 2008 - 2020**

Year	Customers Receiving Disconnect Notice	Customers Seeking CWR Protection	Customers Granted CWR Protection	% Granted	Customers Disconnected Involuntarily	Customers Restored within 24 Hours	Customers Restored by Entering Payment Plan
2008	1,175,953	86,092	86,092	100%	28,863	11,449	727
2009	1,186,057	140,862	140,862	100%	29,612	11,214	1,253
2010	1,218,073	173,440	173,440	100%	29,592	12,121	1,265
2011	1,282,576	188,091	188,271	100%	27,120	11,273	1,446
2012	1,207,842	279,713	279,713	100%	27,132	11,010	1,047
2013	1,217,049	126,477	126,477	100%	23,493	9,221	882
2014	1,166,978	105,561	105,561	100%	25,532	10,283	1,250
2015	1,042,775	151,956	151,956	100%	26,756	11,556	1,201
2016	870,665	130,052	130,052	100%	20,574	7,698	1,512
2017	747,409	140,943	140,943	100%	19,212	6,564	1,251
2018	559,011	115,472	115,472	100%	17,337	6,586	1,506
2019 <sup>23</sup>	521,548	80,713	80,713	100%	16,693	6,318	4,250
2020	222,803	58,225	58,225	100%	2,820	1,610	969

<sup>22</sup> Report at pages 71 and 72.

<sup>23</sup> 2019 and 2020 figures represent Minnesota-only customers. Prior Years included North and South Dakota.

Xcel also reported information on commercial involuntary disconnections. The significant decrease in customers receiving disconnect notices and Cold Weather Rule protection was due to Governor Walz's declaration of a peacetime emergency on March 13, 2020.<sup>24</sup>

### *3. Service Extension Requests*

The following information is required for reporting on service extension request response times by customer class and calendar month:

- A. the number of customers requesting service to a location not previously served by the utility and the intervals between the date service was installed and the later of the in-service date requested by the customer or the date the premises were ready for service; and
- B. the number of customers requesting service to a location previously served by the utility, but not served at the time of the request, and the intervals between the date service was installed and the later of the in-service date requested by the customer or the date the premises were ready for service.

Xcel stated that 292,903 customers requested service to a location previously served in 2020 and that such requests were responded to the next business day.<sup>25</sup> Xcel reported that 5,887 residential and 607 commercial customers requested service to a location not previously served by the Company in 2020.<sup>26</sup> The average interval between request/readiness date and installation date was 5.5 days for residential and 4.0 days for commercial customers.

The Department looks for any trends in overall response times and inquires as needed. Response times for residential and commercial customers in 2020 were significantly lower than data from 2018 – 2019 while the number of installations increased. Xcel indicated that the 2020 Report is the third reflecting service extension request times as tracked by its new Systems, Applications, Processes (SAP) work management system and that 2020 was the year the Company improved its installation times. Xcel will continue training with the new system and is hoping for continued improvement.

The Department acknowledges Xcel's fulfillment of the requirements of Minnesota Rules, part 7826.1600.

### *4. Call Center Response Time*

The annual service quality report must include a detailed report on monthly call center response times, including calls to the business office and calls regarding service interruptions.

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<sup>24</sup> See Docket No. E,G999/CI-20-375.

<sup>25</sup> 2020 Report, p. 76.

<sup>26</sup> Table 14 of 2019 Report, page 55.

Minnesota Rules, part 7826.1200 requires utilities to answer 80 percent of calls made to the business office during regular business hours and 80 percent of all outage calls within 20 seconds.

Xcel provided monthly call volume and response time information in Attachment K. In 2020, an average of 85.8 percent of calls to the Company were answered within 20 seconds.<sup>27</sup>

The Company assumes that all calls handled by its Interactive Voice Response (IVR) system are answered within 20 seconds for both calls made during business hours and calls related to service interruptions. For calls handled by Xcel's Agents, an average of 59.4 percent were answered within 20 seconds in 2020. In 2019 the same calculation resulted in 76.8 percent.

Xcel provided a lengthy explanation of its efforts to protect and keep its call center employees productive during the period from March through December 2020. The upshot of that discussion is that the Company attempted to transition its call center employees to a remote work force during March 2020. Technology issues, civil unrest, a hiring freeze, and limited use of overtime created a situation in which the Company was unable to respond to an even lower number of calls in 2020 than in 2019 at a similar level of service.<sup>28</sup>

Xcel is attempting to remedy this situation, but as of the beginning of 2021 the contact centers were only staffed at approximately 85 percent of capacity. This suggests that the problem will likely be ongoing.

The Department shares the Company's concerns regarding the degradation in its agent-related metrics and requests that the Company provide additional information on the progress it has made regarding hiring new call center representatives in 2021 and the effects of those new employees on its agent-only metrics.

The Department acknowledges Xcel's fulfillment of the requirements of Minnesota Rules, part 7826.1200.

##### *5. Emergency Medical Accounts*

Reporting on emergency medical accounts must include the number of customers who requested medical account status under Minnesota Statutes, section 216B.098, subd. 5, the number of applications granted, the number of applications denied, and the reasons for each denial.

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<sup>27</sup> Department's calculations are based on data provided in Attachment K.

<sup>28</sup> By comparison, OTP's service quality report on call center response time states, "In mid-March of 2020, in response to the COVID-19 pandemic, we moved all call center team members to work remotely from home. Our agents were able to maintain a high service standard for our customers to ensure that our transition to working remotely, did not negatively impact our customers." OTP's call center response time for 2020 was that 94.04% of all calls were answered within 20 seconds. See Docket E017/M-21-225, page 54.

Xcel reported that as of March 2021 2,162 Minnesota customers had requested and received Emergency Medical Account status.<sup>29</sup>

In 2020 a lower number of households requested Emergency Medical Account status, but a higher percentage were granted this status (94.8 percent).

Table 15 below shows the historical numbers regarding Medical Accounts.

**Table 15: Residential Customers Requesting Emergency Medical Account Status 2008 – 2020**

Year	Requested Medical Acct. Status	Granted Medical Acct. Status	Percent Granted
2008	1,847	1,460	79.0%
2009	1,783	1,292	72.5%
2010	1,762	1,162	65.9%
2011	1,572	716	45.5%
2012	1,508	679	45.0%
2013	1,562	832	53.3%
2014	1,780	1,012	56.9%
2015	3,333	2,557	76.7%
2016	3,427	2,713	79.2%
2017	3,150	2,388	75.8%
2018	2,818	2,267	80.4%
2019	2,420	2,196	90.1%
2020	986	935	94.8%

The Company also noted that it contacted hospitals and clinics within its service territory and provided information about the program. Xcel is also continuing to identify additional groups that might have medically necessary equipment.

The Department acknowledges that Xcel has fulfilled the requirements of Minnesota Rules, part 7826.1800.

#### *6. Customer Deposits*

Reporting on customer deposits must include the number of customers who were required to make a deposit as a condition of receiving service.

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<sup>29</sup> This status must be requested and approved annually.



Table 16 below summarizes the number of accounts that Xcel has reported required deposits. The Department notes that the Company requests these deposits from residential customers who have filed for bankruptcy.

**Table 16: Customer Deposits Required 2008 – 2020**

Year	Number of Deposits
2008	805
2009	798
2010	657
2011	655
2012	622
2013	652
2014	606
2015	561
2016	362
2017	314
2018	394
2019	486
2020	678

The Department acknowledges Xcel's fulfillment of the requirements of Minnesota Rules, part 7826.1900.

## 7. Customer Complaints

Reporting on customer complaints must include the following information by customer class and calendar month:

- 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: (1) taking the action the customer requested; (2) taking an action the customer and the utility agree is an acceptable compromise; (3) providing the customer with information that demonstrates that the situation complained of is not reasonably within the control of the utility; or (4) 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 (CAO) for further investigation and action.

Xcel reported that 430 complaints were handled by the Company's Customer Advocate Group in 2020, 239 of which were forwarded by the CAO.<sup>30</sup> Data provided by the Company showed that 14.4 percent of complaints in 2020 handled by Xcel's Customer Advocate Group were resolved upon inquiry.<sup>31</sup> The most frequent complaint category was "inadequate service." Xcel reported that 35.8 percent of these complaints in 2020 were resolved by taking the action the customer requested.<sup>32</sup>

Xcel also received 285,557 complaints in 2020 that were handled upon initial inquiry in the Company's Call Centers. Xcel reported that approximately 99.04 percent of these complaints were resolved by taking the action the customer requested. The complaint category with the largest volume for all customers was "billing errors." The number of calls handled upon initial inquiry was 48 percent lower than the reported figure in 2019. That is quite a decline in the number of complaints. The Department asks that the Company discuss whether it expects a large drop of customer complaints in 2021 as well in its Reply Comments. The percentage figures for the percentage of complaints that were resolved by taking the action the customer requested declined slightly from 2019 but is consistent with results from prior years.

Xcel's report on customer complaints includes the required information. Table 17 contains a limited summary of Xcel's customer complaint history as received through the Company's Customer Advocate Group.

**Table 17: Selected Summary of Customer Complaints<sup>33</sup>**

Year	Number of Complaints	Inadequate Service	Wrongful Disconnect	Billing Error	Resolved Upon Initial Inquiry	Took Action Customer Requested
2010	693	44.90%	21.90%	18.20%	17.00%	29.10%
2011	627	49.10%	17.20%	16.70%	13.20%	28.20%
2012	613	53.50%	19.70%	17.30%	18.60%	27.41%
2013	745	55.80%	15.60%	13.80%	18.90%	38.26%
2014	770	53.20%	19.70%	14.80%	16.80%	51.30%
2015	789	52.50%	23.40%	13.30%	14.30%	29.50%
2016	547	52.10%	19.00%	14.60%	16.30%	32.70%
2017	572	53.50%	24.50%	10.50%	18.00%	27.10%
2018	664	58.10%	18.80%	11.60%	20.60%	26.70%
2019	756	59.70%	17.30%	11.10%	14.00%	26.70%
2020	430	57.20%	3.70%	16.30%	14.40%	35.8%

The decrease in the percentage of Wrongful Disconnect complaints is apparently due to the disconnection moratorium established in response to the COVID-19 pandemic.

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<sup>30</sup> Attachment L of the Report, pp. 1-4.

<sup>31</sup> Id.

<sup>32</sup> Id.

<sup>33</sup> Attachment J of the Report, p. 2.

The Department acknowledges Xcel's fulfillment of the requirements of Minnesota Rules, part 7826.2000.

## **Section F – Review of Annual Service Quality-related Commission Orders**

There are significantly fewer requirements based on Commission Orders for this topic than for service reliability.

### *1. Meter Equipment Malfunctions*

In the Commission's November 30, 2010 Order in Docket Nos. G002/CI-08-871 and E, G002/M-09-224, at Order Point 2, the Commission directed the Company to file the following information with its annual electric service quality reports filed pursuant to Minn. Rules, Part 7826.0500:

- 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 Company provided this information in Attachment J to the filing. It appears that the total amount of orders increased from 7441 in 2019 to 8269 in 2020 or 11 percent. The average days for those orders decreased from 4.24 in 2019 to 3.88 in 2020 while the total number of maximum days and the standard deviation increased from 44 to 88 and 2.86 to 3.69 respectively. The Department would characterize Xcel's 2020 results as mixed compared to its 2019 results.

The Department acknowledges Xcel's fulfillment of the requirement listed in the Order listed above.

### *2. Involuntary Disconnections and Service Extension Response Times*

There are no additional Order based reporting requirements for these two topics.

### *3. Call Center Response Times*

- a. In the Commission's November 3, 2004 Order in Docket No. E002/M-04-511, at Order Point 6, the Commission required the Company to "include on a going forward basis, data regarding credit calls ... in its calculation of call center response times."

Xcel included this information in its calculations included in Attachment K.

- b. In the Commission's December 18, 2020 Order in Docket No. E002/M-20-406, at Order Point 13, the Commission required the company to clarify call center data in its 2020 service quality reports, discuss the Company's efforts to improve the reliability of its Customer Resource System, and explain why interactive voice response is included in reporting for calls answered within the 20-second threshold.

The Company included this information on pages 79 and 80 of the filing. The Department reviewed the information and considers it to be responsive to the Commission's request.

The Department acknowledges Xcel's fulfillment of the requirement listed in the Orders listed above.

#### *4. Emergency Medical Account and Customer Deposits*

There are no Order based reporting requirements for these two topics currently.

#### *5. Customer Complaints*

- a. In the Commission's December 18, 2020 Order in Docket No. E002/M-20-406, at Order Point 16, the Commission ordered: after consultation with Department and Commission staff, each utility must file revised categories for reporting complaint data. The Commission hereby delegates authority to the Executive Secretary to approve additional reporting requirements with the goal of establishing them by the April 1, 2021 reporting deadline.

The Department is participating in the Commission Staff's efforts to further refine definitions for existing categories to allow for greater specificity and seek consistency where possible. As part of the process, the Department suggested that Commission Staff and the Consumer Affairs Office (CAO) consider developing a complaint category for customers who own distributed generation that Xcel purchases.

The Department's reasoning for this new category is that historically utility customers only received electricity generated by the Company. From the Department's perspective, electric service for those customers consists of providing the infrastructure and generation to deliver electricity on the distribution system. The Department classifies those customers as "one-way" flow customers.

Historically, third-party generators like Independent Power Producers (IPPs) that had power purchase agreements with the utility also provided "one-way" service to Xcel. Like traditional residential customers, the electrical distribution and transmission system was designed to allow for this power flow to the utility. Historically, the IPP's generation was directed by the utility or the regional independent transmission entity.

Distributed Energy Resource (DER) customers, who are both selling and purchasing electricity combine those two functions with the additional complexity of providing electricity on an interruptible basis. Thus, those DER customers have combined those buying and selling functions are “two-way” flow customers. Two-way flow customers’ relationship combines the standard function of the delivery of electricity with the additional functionality of delivering non-dispatchable electricity onto the Company’s distribution system.

This is a much more complicated relationship as the Commission’s ongoing interconnection dockets demonstrate. This “two-way” flow relationship is also complicated by the presence of vendors who are attempting to profit from the installation of distributed generation on Xcel’s system and whose business objective may not completely coincide with those of the DER customers themselves.<sup>34</sup>

Thus, the Department asks that the Company provide a discussion of the possibility of developing a complaint category for DER customers by customer class in Reply Comments.

The Department acknowledges Xcel’s fulfillment of the requirement listed in the Order listed above.

- b. In the Commission’s May 14, 2019 Order in Docket No. E002/M-18-239, at Order Point 4, the Commission required the Company to “further break down and explain the percentage of complaints they received that were not within the utilities’ control (i.e., those related to energy-efficiency providers, solar installers, or other vendors/matter) and include a short summary in their electric service quality reports due April 1, 2020.

The Company provided that information in Attachment L as well as a description of the information included in that attachment on pages 84 and 85 of the filing.

The Department acknowledges Xcel’s fulfillment of the requirement listed in the Order listed above.

#### *6. Electronic Customer Contacts*

In the Commission’s December 18, 2020 Order in Docket No. E002/M-20-406 at Order Point 14, the Commission required the Company to report the following for the 2020 and 2021 reporting cycles.

- a. Yearly total number of website visits:
- b. Yearly total number of logins via electronic customer communication platforms.
- c. Yearly total number of emails and other customer service electronic communications received; and
- d. Categorization of email subject, and electronic customer service communications related to assistance programs and disconnections as part of reporting under Minn. R. 7826.100.

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<sup>34</sup> The Department discussed this topic more thoroughly in its Comments dated July 2, 2020 in Docket nos. E, G-002/CI-02-2034 & E-002/M-12-383.

The Company did provide the information requested in (a) and (b). Xcel stated in the filing that it will supplement the filing with the information requested in (c) and (d).

The Department prefers to review all the information related to the requirement before providing its recommendation.

#### *7. Planned Outage Communication*

In Docket No. E002/M-17-553, the Company requested Commission approval, among other things, to use express customer communication preferences in communicating planned outages to customers. The Commission approved the Company's request in an Order dated November 2, 2017. Xcel committed to providing the following information:

- a. Number of customers who opted-in to preferences.
- b. Of those customers, how many prefer each type of communications
- c. The number of customers who change or cancel their preferences and stated reason, if known; and
- d. The CSR will continue to include statistics on customer complaints.

The Company reported that 3,559,285 customers have opted to receive outage notifications. These include 12,658,962 who would receive the notification via emails, 1,574,746 via Text/SMS messages and 325,577 to receive phone notification of the outage. Slightly over 24,158 customers have opted out of the preferences. The Company is not employing this system yet. Xcel provided no date when they believed it would be completed.

The Department acknowledges Xcel's fulfillment of the requirement listed in the Order listed above.

#### *8. Customer Satisfaction*

In Docket Nos. E002/M-16-281 and E002/M-17-249, at Order Point 3.E., dated February 9, 2018 the Commission required the Company to "provide the following information in its next annual service quality report: The Company's internal customer satisfaction goals and a comparison of the Company's actual performance to those goals, as well as an explanation of the basis for those customer satisfaction goals."

In Docket No. E002/M-18-239 in an Order dated May 14, 2019, the Commission required the Company to "provide refreshed information responsive to the Commission's February 9, 2018 order in future annual service-quality filings."

Xcel provided the internal goals information. The Company achieved two out of four (50 percent) of the annual customer satisfaction goals identified in 2020. Xcel also provided information from JD Power, which concluded that residential customers are very satisfied with Xcel while its small/medium customers are not quite as satisfied as its residential customers.

The Department acknowledges Xcel's provision of the information required in the two Orders listed above.

### **III. CONCLUSION AND RECOMMENDATIONS**

The Department recommends the Commission:

- accept the Company's 2020 Safety Report.
- require Xcel to perform an analysis that models the effects of selling some portion of the service territory contained in the Company's Southeast work center on that work center's reliability metrics. This analysis would be included in the Company's 2021 Service Quality and Service Reliability filing.
- require the Company to provide additional information in their annual reports for the next two reporting cycles, to build baselines for web-based service metrics. Specifically, the Department requests that the utilities provide, at a minimum, the following:
  - The percentage uptime, to the second decimal, of the utility's:
    - general website
    - payment services
    - outage map and/or outage information page
  - the error rate percentage, to the third decimal, of the utility's payment services.
    - If more granular data is available, please break down the error rate for unexpected errors, errors outside of the customer's control (i.e., how often to online payments fail for reasons other than insufficient funds or expired payment methods), and/or some other meaningful categorization.

The Department also requests that the Company provide information on the following topics in its Reply Comments.

- Re-designing the Company's Customer Service Quality and Reliability Metrics infographic.
- Provide additional information as to why the Company vegetation management expenditure decreased by 36 percent from 2019 to 2020.
- Provide updated information on call-center operations and response times.
- Discuss the development of a complaint category for Distributed Energy Resources customers by customer class.
- if Xcel has a chat feature on its website, and whether that chat feature is:
  - live and staffed by internal utility employees.
  - live and staffed by third-party vendor employees.
  - a chat bot; or
  - something else and/or a combination of the above options.
- if the Company uses internal or third-party monitoring of website functionality including, but not limited to, metric analysis and on-call services for critical website failures.

- |                |                                  |   |
|----------------|----------------------------------|---|
| Xcel Energy    | Information Request No.          | 5 |
| Docket No.:    | E002/M-21-237                    |   |
| Response To:   | Minnesota Department of Commerce |   |
| Requestor:     | John Kundert                     |   |
| Date Received: | May 20, 2021                     |   |

c. The Company considers reliability as a key performance indicator and believes the solution to improving those numbers are identifying areas of opportunities for improvement through operational and engineering changes. Although the reliability in more rural areas has not been as good as urban areas, we are committed to improving the reliability in these areas. The Southeast area typically performs in the second quartile for SAIDI and first quartile for SAIFI (Graphs 27 and 28); while the CAIDI measure (Graph 29) jumps around from low second quartile to high fourth quartile.



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**Attachment B – Checklist and Reference of Minnesota Rule Requirements**

<b>Requirement</b>	<b>Items</b>	<b>Section</b>
7826.0400 Annual Safety Report	A. & B.	B
7826.0500 Reliability Reporting Requirements	A. through C.	C.1
	D.	C.2
	E.	C.3
	F.	C.4
	G.	C.5
	H.	C.6
	I.	C.7
	J.	C.8
	K.	Not applicable
7826.0600 Reliability Standards		C.9
7826.0700 Reporting Major Service Interruptions	Subpart 1 – A through D	C.5
	Subpart 2 A & B	C.5
7826.1200 Call Center Response Times	Subpart 1	E.4
	Subpart 2	E.4
7826.1400 Meter-Reading Performance	A through D	E.1
7826.1500 Involuntary Disconnection	A through D	E.2
7826.1600 Reporting Service Extension Request Response Times	A & B	E.3
7826.1700 Reporting Call Center Response Times		E.4
7826.1800 Reporting Emergency Medical Account Status		E.5
7826.1900 Reporting Customer Deposits		E.6
7826.200 Reporting Customer Complaints	A through E	E.7

**Attachment C – Checklist and Reference of Relevant Commission Orders**

<b>Docket No./Order Date</b>	<b>Items</b>	<b>Location</b>
E002/M-20-406, December 18, 2020	3. Southeast Work Center ongoing reliability reports	D.10
	4.	Not applicable
	5.	D.8
	6.	Not applicable
	11.	Future filing
	13.	F.3.b
	14.	F.6
	16.	In process
	17.	D.1
	18.	D.6
	19.	A.5.a
E002/M-19-261, January 28, 2020, 2. Attachment B	1.	D.5
	2.	D.5
	3.	D.15
	4.	D.16
	5.	D.16
	6.	D.17
	7.	D.17
	8.	C.8
	9.	D.13
	10.	D.7
	11.	D.6
	12.	D.1
E002/M-18-239, May 14, 2019	4. Complaints not within utilities control	C.7
	6. Update information in future of Docket Nos. E002/M-16-281 and E002/M-17-249	Not applicable
E002/M-18-239, March 19, 2019	3. (a) and (b)	D.5
	3. (c)	D.16
	3. (d)	D.17
	3. (e)	D.17
	3. (f)	D.13
	3. (g)	D.7
	3. (h)	D.6
E002/M-17-249 and R002/M-16-281, February 9, 2018	3. (a)	D.7
	3. (b)	D.4
	3. (c)	D.15
	3. (d)	D.13
	3. (e)	F.8

	3. (f)	Not applicable
	3. (h)	E.5
E002/M-14-131, December 12, 2014	3.	D.1
	4.	D.5
	5.	D.5
	6.	D.5
	7.	C.5
E002/GR-12-961, November 19, 2013	1.	D.15
	2.	D.15
	3.	D.15
	4.	D.15
	5.	D.15
Docket Nos. G002/CI-08-871 and E,G002/M-09-224, November 30, 2010	Field Order Information	F.1
E002/M-05-551, April 7, 2006	3. Worst Performing Feeders	D.11

## **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. E002/M-21-237**

Dated this **16<sup>th</sup>** day of **August 2021**

**/s/Sharon Ferguson**

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