

Staff Briefing Papers: Volume 1

Meeting Date November 23, 2021

Agenda Item *4

Company Minnesota Power, Otter Tail Power Company, and
Northern States Power Company d/b/a Xcel Energy

Docket No. **E015/ M-21-230**
E017/ M-21-225
E002/ M-21-237

**In the Matter of Minnesota Power's, Otter Tail Power Company's, and Xcel
Energy's 2020 Annual Service Quality Reports**

- Issues
1. Should the Commission accept Minnesota Power's, Otter Tail Power's, and Xcel Energy's 2020 Service Quality Metrics reports?
 2. Should the Commission take any action on the engagement plans related to Emergency Medical Account status?
 3. Do the additional measures of electronic utility-customer interactions provide a more complete picture of how customers experience utilities' customer service?

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The attached materials are work papers of the Commission Staff. They are intended for use by the Public Utilities Commission and are based upon information already in the record unless noted otherwise.



Relevant Documents

Date

Annual Report, Otter Tail Power
Annual Report, Minnesota Power
Annual Report, Xcel Energy

April 1, 2021
April 1, 2021
April 1, 2021

Comment, Department of Commerce, to 21-225 (OTP)
Comment, Department of Commerce, to 21-230 (MP)
Comment, Department of Commerce, to 21-237 (Xcel)

August 16, 2021
August 16, 2021
August 16, 2021

Reply, Otter Tail Power
Reply, Minnesota Power
Reply, Xcel Energy

August 26, 2021
August 26, 2021
September 2, 2021

Letter, Department of Commerce, to 21-225 (OTP)
Letter, Otter Tail Power

October 5, 2021
October 15, 2021

Compliance Filing. OTP in Docket 20-401
Compliance Filing. MP in Docket 20-404
Compliance Filing. Xcel in Docket 20-406

January 18, 2021
January 18, 2021
January 19, 2021

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I. Statement of the Service Quality Issues

1. Should the Commission accept Minnesota Power's, Otter Tail Power's, and Xcel Energy's 2020 Service Quality Metrics reports?
2. Should the Commission take any action on the engagement plans related to Emergency Medical Account status?
3. Do the additional measures of electronic utility-customer interactions provide a more complete picture of how customers experience utilities' customer service?

II. Introduction

Minnesota's Electric Investor-Owned Utilities [IOUs; Minnesota Power (MP), Xcel Energy (Xcel) and Otter Tail Power Company (OTP)] submit Safety, Reliability, and Service Quality (SRQR) Reports annually. Beginning in 2018, Commission staff split the reports into two sections. The Safety and Reliability portion will be summarized in Volume 2 of briefing papers and heard by the Commission at a future date. Here, we focus on the Service Quality and Reporting standards as laid out in Minnesota Rules, Chapter 7826, Electric Utility Standards, with specific attention to the reporting requirements enumerated in 7826.1400 to 7826.2000.

Staff reviewed this year's reports to ensure compliance with the December 18, 2020 Order¹ following 2019 SRSQ reporting (see Table 1). Additionally, in March 2020, in Docket No. 20-375, *In the Matter of an Inquiry into Actions by Electric and Natural Gas Utilities in Light of the COVID-19 Pandemic Emergency*, the Commission requested voluntary residential consumer protection measures from utilities. Later, the Commission formally required gas and electric rate-regulated utilities to file monthly compliance reporting that includes data on disconnections, payment plans, customer counts, among many other items. Staff reviewed this year's SRSQ reports with an additional focus on the reported impacts of COVID-19 to utilities and their service provisions. However, Staff recognizes most documentation of COVID-19 impacts to residential customers are filed in the short-term reporting docket No. 20-375.

Table 1. Service Quality Reporting Data Ordered by the Commission after 2019's filing

Order Point	Reporting Standard	Details	See Page
13	7826.1700 Call Center Response Times	Xcel Energy was ordered to clarify call center data, including discussing efforts to improve the reliability of its Customer Resource System, and explain the use of interactive voice response (IVR) in reporting for calls answered within 20-second threshold.	Page 14
14	7826.1700 & .2000 Call Center Response Times	Utilities were ordered to expand their customer interactions by reporting website visits, logins via electronic customer communication platforms, and emails or other electronic communications as well as categorize those emails etc. by subject.	18-21

¹ Order filed in dockets 20-401, 20-404, and 20-406 on December 18, 2020 p8-9.

	& Customer Complaints		
15	7826.1800 Emergency Medical Account Status (EMS) 7826.1600 Service Extension Request Response Times	Utilities were required to file explanatory narratives on: 1) Customer engagement plans regarding Emergency Medical Account status (EMS) 2) Otter Tail and Xcel Ordered to include a detailed description of the resolution to the reporting problems attributed to their updated Customer Information System (CIS)/SAP work management system pertaining to response times.	EMS-15-16 OTP's CIS- 12 Xcel's SAP-11
16	7826.2000 Customer Complaints	After consultation with Department and Commission staff, each utility was instructed to file revised categories for reporting customer complaint data.	16-18
17		The Executive Secretary has authority to approve Xcel's, MP's, and OTP's public-facing summaries.	22, App. B

III. Overview of Comments on Service Quality

The Department of Commerce, Division of Energy Resources (Department) was the only party that commented within all three utilities' service quality dockets. Comments will follow presentation of utility data for each reporting standard. Additional comments were submitted in Xcel's docket by the Energy CENTS Coalition (ECC) and the Environmental Law & Policy Center (ELPC) and Vote Solar submitted, with Replies from the Department and Xcel, but were focused on issues from the on-going Performance-Based Ratemaking for Xcel's electric service (Docket No. 17-401, *In the Matter of a Commission Investigation to Identify and Develop Performance Metrics and, Potentially, Incentives for Xcel Energy's Electric Utility Operations*). ECC provided recommendations regarding the equity metrics and mapping that Xcel created with input from stakeholders and Commission staff. ECC recommended additional datapoints for the map and requested they be filed annually with Xcel's SQSR reports. Likewise, Vote Solar and ELPC recommended that Xcel take on locational reliability and equity analysis in their annual SQSR reporting. "Because annual performance targets are set in this docket, we recommend that the Commission require the Company to propose locational reliability and equity performance targets in its next Safety, Reliability, and Service Quality docket in 2022."² Vote Solar and ELPC also recommended the Commission establish performance incentives and targets based on SQSR data. Staff thanks parties for those additional considerations but recommends those issues instead be discussed within Docket No. 17-401 as the Commission's process would be to first consider any new metrics and processes in the originating docket, 17-401, before modifying other dockets, such as annual reporting.³

² Vote Solar and Environmental Law & Policy Center Comments filed in Docket 21-237 August 16, 2021, pg 4.

³ Staff appreciates the comments brought forward. Pursuant to the Commission's April 16, 2020 ORDER ESTABLISHING METHODOLOGIES AND REPORTING SCHEDULES in Docket No. 17-401, Xcel Energy filed the first annual report on April 30, 2021 detailing the evaluation of 28 metrics and updates on processes and future metrics, including those discussed by the parties. Additionally, an update to the equity mapping process was filed by Xcel Energy in the same docket on October 1, 2021. Staff will take these comments into 17-401.

Broadly, the Department offered the following:

MP- The Department acknowledged that MP fulfilled all service quality reporting requirements for Minnesota Rules parts 7826.1400-.2000, though did not comment on 7826.1900 as MP ceased collecting customer deposits in 2014. Despite acknowledgement of fulfillment, the Department sought more information from MP, yet ultimately recommended the Commission accept MP's Annual Safety and Service Quality Reports once the Company provided all required information.⁴

Xcel- The Department recommended the Commission accept Xcel's annual report as the Company provided all required information. The Department acknowledged that Xcel fulfilled reporting requirements outlined in Rules 7826.1400 - 7826.2000 but did not comment on fulfillment of 7826.1500 (disconnections).

OTP- The Department acknowledged that OTP fulfilled all service quality reporting requirements of the Minnesota Rules, parts 7826.1400-.2000; thus, recommended the Commission accept OTP's Annual Report.⁵

IV. Reporting Standards

Minnesota Rules Ch. 7826 requires a variety of reporting by the utilities. This set of briefing papers will address the service quality, which includes disconnection and involuntary disconnections, extension service requests, call center response times, customers who have requested medical account status, and customer complaints. The full text of reporting standards can be found in Appendix A and are covered by these rules:

7826.1400 REPORTING METER-READING PERFORMANCE.
7826.1500 REPORTING INVOLUNTARY DISCONNECTIONS.
7826.1600 REPORTING SERVICE EXTENSION REQUEST RESPONSE TIMES.
7826.1700 REPORTING CALL CENTER RESPONSE TIMES.
7826.1800 REPORTING EMERGENCY MEDICAL ACCOUNT STATUS.
7826.1900 REPORTING CUSTOMER DEPOSITS.
7826.2000 REPORTING CUSTOMER COMPLAINTS.

A. 7826.1400 Meter Reading Performance

Utilities explained how the COVID-19 pandemic impacted their ability to read meters; specifically, concern for worker safety precluded entering some buildings (OTP) or caused a suspension of field reading (MP and Xcel). Xcel reported that meter reading staff levels in 2020 were the same as 2019 at 12.5 staff persons⁶; MP also employed the same number of staff (6)

⁴ MP provided requested information pertaining to electronic customer communication in reply comments filed August 26, 2021 in Docket No 21-230, p4.

⁵ Department Comments submitted to docket 21-225 on August 16, 2021 p3; aside from expected supplemental filings related to reliability metrics.

⁶ Xcel initial filing, filed April 1, 2021 into docket 21-237, p72.

in 2020 as in 2019.⁷ OTP reported an increase in towns being served by a third-party meter reader, explained by the retirement of a full-time meter-reader employee. Table 2 shows that as staffing levels remained constant, the pandemic impacted ability to read meters.

Table 2. Monthly Averages for Meter Reading 2018-2020

Utility	YEAR	# Company Read	# Self Read	Not Read 6-12 mo.	Not Read 12+ mo.
MP	2018	149,628.3	71.0	20.0	0.0
MP	2019	150,525.0	74.3	47.0	0.0
MP	2020	153,075.0	76.0	132.0	0.0
Xcel	2018	1,718,168.8	5.4	4,074.0	1,388.0
Xcel	2019	1,786,388.7	7.1	4,371.0	1,732.0
Xcel	2020	1,805,655.5	10.4	3,146.0	1,868.0
OTP	2018	78,343.4	1,177.5	2.0	0.0
OTP	2019	78,566.3	1,041.3	2.0	0.0
OTP	2020	78,164.6	1,072.3	52.0	0.0

As Rule 7826.1400 requires monthly reporting, data reported here show average number of meters read monthly. Color is used to separate among utilities only.

1. Comments on Meter Reading

The Department noted that for MP, all 132 unread meters (6-12months only, no meters unread for 12+ months) were result of inability to access those meters. For Xcel, the Department flagged a slight decrease in meters read by Staff (and concurrent slight increase in meters self-read) but noted that these changes were “consistent with the difficulties the Company experienced operationally due to the COVID-19 pandemic.”⁸ Finally, for OTP, “The Department recognizes the difficulties presented by COVID-19 and has no concerns regarding the increase in number of meters that were not read for a period of 6-12 months.”⁹

2. Advanced Metering Infrastructure (AMI)

MP refocused field staff on AMI installations (see Figure 1, “Table 6” from the Company’s report on page 27) while field readings were suspended.¹⁰ Of note, MP’s Remote Reconnect Pilot (using AMI for which the Company will provide meter upgrades at no cost) start date was delayed until normal operating procedures resume.¹¹

Figure 1. MP’s Meter Equipment

⁷ MP initial filing, filed April 1, 2021 into docket 21-230, p32.

⁸ Department, reply comment in docket 21-237, filed August 16, 2021, p33.

⁹ Department Comments submitted to docket 21-225 on August 16, 2021 p21.

¹⁰ MP initial filing, p12 discusses redeployment of employees. Figure X copied from p27 of MP’s Annual Report Appendix A, reports on status of MP’s AMR, AMI, and mechanical meters.

¹¹ MP’s Remote Reconnect Pilot can be found in Docket 19-766; initial MP filing made December 2, 2019.

TABLE 6: METER EQUIPMENT AND PERCENTAGE DEPLOYED

Equipment	Percent in Use ¹	Description
Mechanical Meters	< 1%	Traditional electro-mechanical meter that records kWh usage.
AMR – Mechanical Hybrid	15.15%	Traditional Electro-mechanical meters that are retro-fitted with a one-way electronic automatic meter reading (AMR) module capable of reporting multiple quantities including kWh, kW, and outage count.
AMR – Solid State	0.59%	Modern Solid State electronic meters integrated with a one-way AMR module or retrofitted with an external AMR unit. Capable of reporting multiple quantities including kWh, kVARh, kW, and outage count.
AMI – Solid State	84.09%	Modern solid state devices integrated with a two-way AMI communication module. Capable of multiple measurement functions including Time of Use (TOU), kW, kWh, KVA, kVAh, kVAR, kVARh, instantaneous and average voltage, two channel load profile, and remote disconnect. Also capable of remote firmware, program, and display updates.

Xcel utilizes the Cellnet Automated Meter Reading service; field personnel are dispatched if meters do not generate an automated reading for two months. However, from April to June 2020, Xcel suspended field readings and meter exchanges and repairs. Then, when Staff returned to the field, the Company explained the resultant backlog, “since repairs to meters/modules were not being done, the number of meters we needed to read increased from approximately 3700 in April to 7500 in September. We did not have the staffing to read this number of meters which led to the increase in No Read Returned skips.”¹² Though meters needing to be read increased, the Company noted that meter-reading staff levels were unchanged from 2019. Finally, despite pandemic-related challenges, the Company reported that it performed within the field response parameters prescribed in their Tariff.¹³

B. 7826.1500 Involuntary Disconnections

Reflecting the Commission’s residential customer COVID-19 response which, began as voluntary protection measures and became an Ordered moratorium on service disconnections¹⁴, utilities reported a decrease in disconnection notices sent and disconnections compared to previous years. Beginning in April 2020, no residential customers were disconnected. In May – December 2020 very few disconnection notices were sent (13 MP, mostly residential lighting service agreements¹⁵; seven Xcel; zero OTP). Before the Commission’s moratorium, the number of notices sent as well as disconnections mirror the pattern shown in 2019 data, apart from the number of customers Xcel disconnected, which doubled (see Table 3 and Tables 4a-f).

¹² Xcel initial filing, p70.

¹³ NSPM Electric Rate Book, General Rules and Regulations, Section No. 6 Meter Equipment Malfunctions, Sheet Nos. 17.2 – 17.4 Xcel Annual Report filed April 1, 2021, p72.

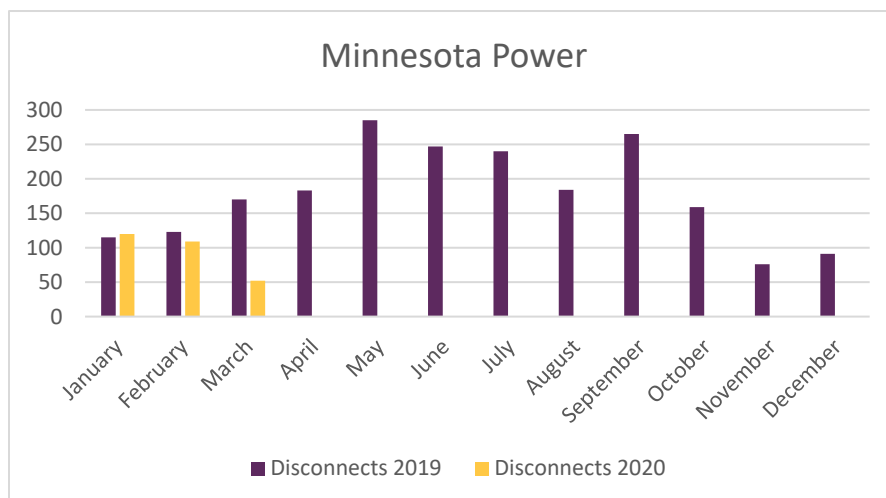
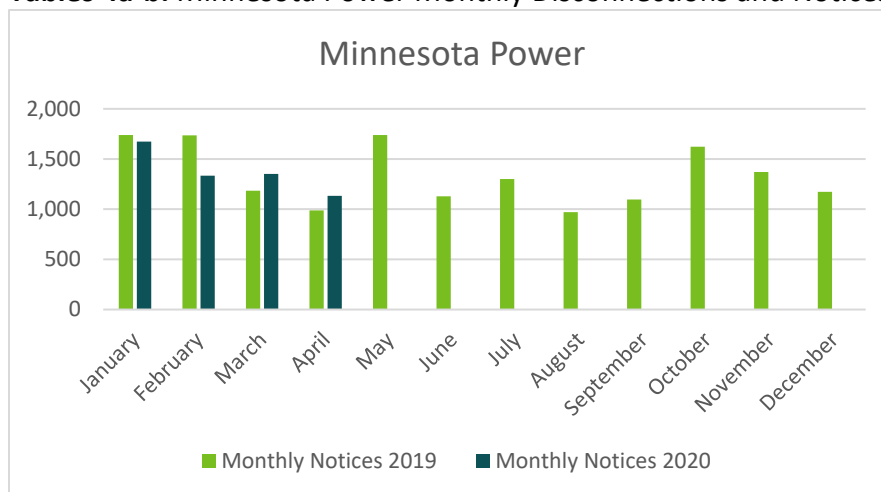
¹⁴ Docket 20-375. Voluntary measures requested on March 25, 2020, following the Governor’s March 13, 2020 Emergency Executive Order 20-01. Order filed August 13, 2020 paragraph 6a.

¹⁵ MP initial filing, Appendix A p33.

Table 3. Comparison of Disconnections and Notices, 2019 and 2020

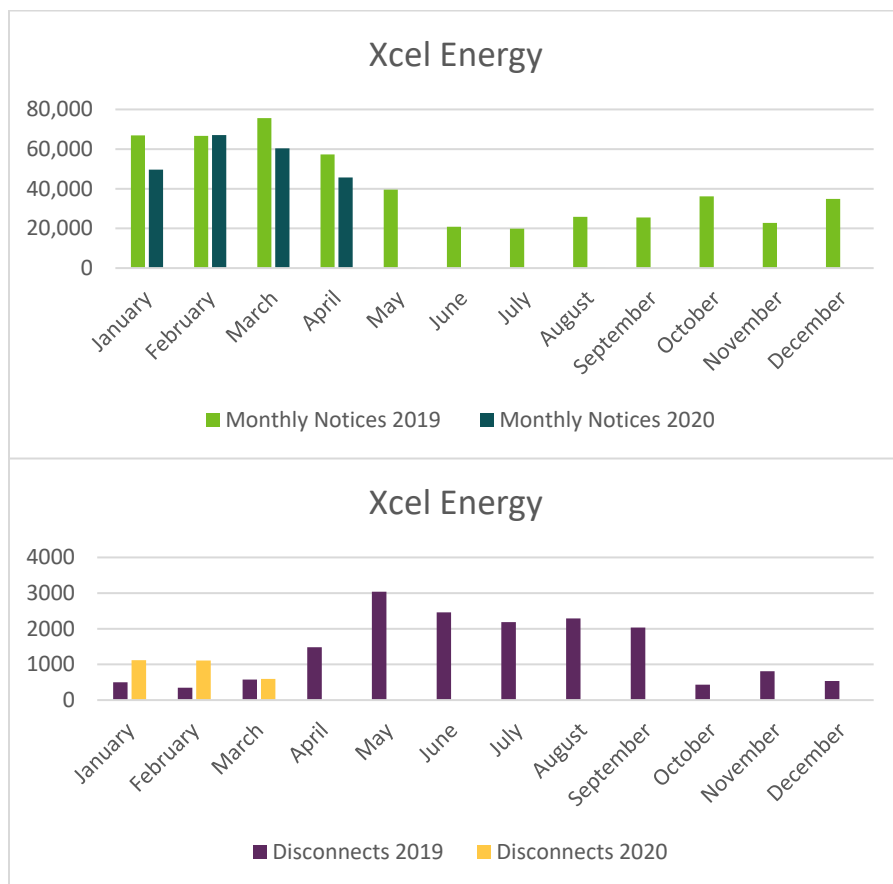
	Customers Receiving Notices Jan- Apr	Total Customers Receiving Notices Entire Year	Disconnects Jan-March	% Restored to service within 24hrs Jan-March	Total Disconnects for Year
MP 2019	5,647	16,049	408	48.8%	2,138
MP 2020	5,491	5,502	281	51.6%	281
Xcel 2019	266,560	492,009	1,422	60.0%	16,693
Xcel 2020	222,796	222,803	2,820	57.1%	2,820
OTP 2019	18,760	51,024	44	36.4%	463
OTP 2020	14,082	14,082	40	37.5%	40

Colors are used to separate among utilities only.

Tables 4a-b. Minnesota Power Monthly Disconnections and Notices, Residential Customers

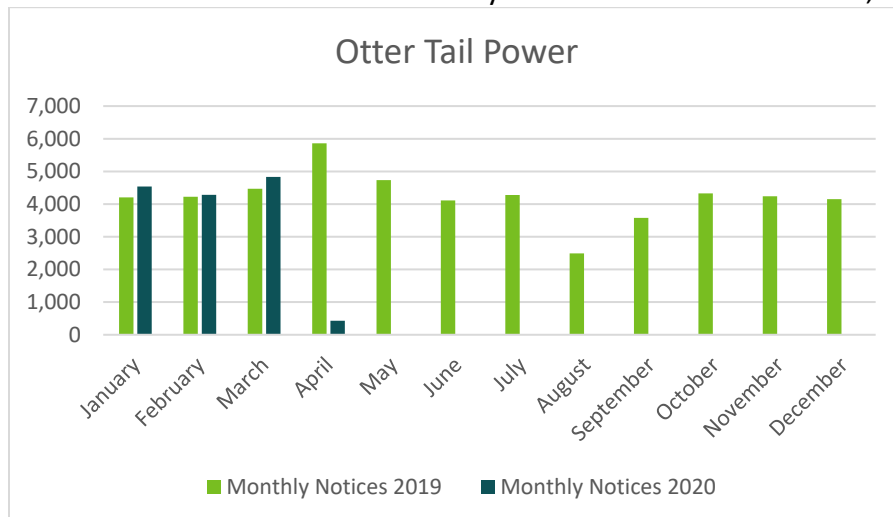
*Includes disconnections restored in 24 hours and after 24 hours

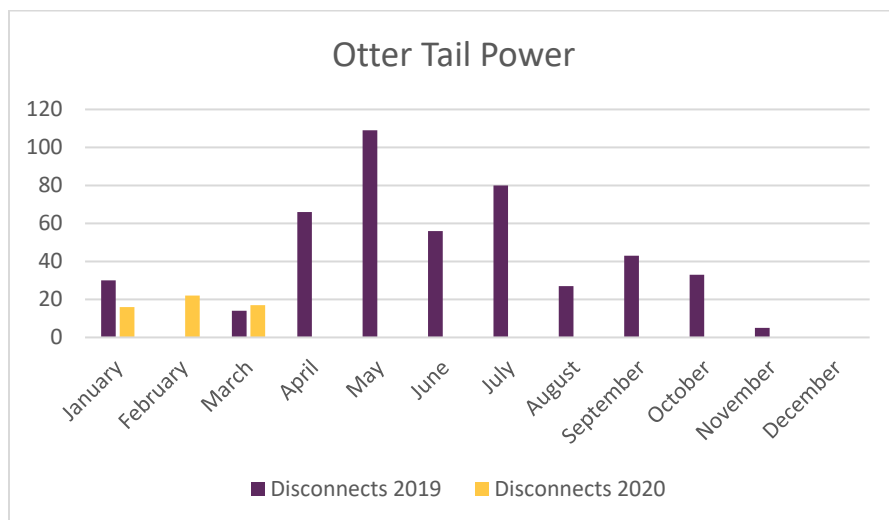
Tables 4c-d. Xcel Energy Monthly Disconnections and Notices, Residential Customers



*Includes disconnections restored in 24 hours and after 24 hours

Tables 4e-f. Otter Tail Power Monthly Disconnections and Notices, Residential Customers





*Includes disconnections restored in 24 hours and after 24 hours

1. Cold Weather Rule

In 2020, Cold Weather Rule protection was sought by: 2,845 MP customers and granted to 100% (sought by 2.7% of total customers); 58,225 Xcel customers and granted to 100% (sought by 4.6% of total customers); and 425 OTP customers and granted to 82% (sought by 0.8% of total customers). The percentage of OTP grantees is lower than other utilities but is not the result of denial of protection but, instead, discussions with the customer and the customer choosing an “alternative payment option.”¹⁶

2. Comments on Disconnections

The Department noted the significant decrease in Xcel customers receiving disconnect notices and Cold Weather Rule protection due to the peacetime emergency declaration.¹⁷ Similarly, for OTP, the Department acknowledged the reduction in number of disconnection notices sent due to the pandemic. The Department did not provide additional commentary for MP.

C. 7826.1600 Service Extension Request Response Times

Compared to previous years, Companies’ 2019 annual reports showed high numbers of service requests and/or long response times (Tables 5-9). Staff aimed to understand if these trends continued in 2020. Additionally, OTP and Xcel were Ordered¹⁸ to give a detailed description of the resolution to the reporting problems attributed to their updated Customer Information System (CIS)/SAP work management system. Staff places Department comments directly following the summary of reported data for each utility.

MP

- More service extension requests to locations previously served were completed on the date requested than were completed late.

¹⁶ OTP initial filing, p47.

¹⁷ Department, reply comment in docket 21-237, filed August 16, 2021, p36.

¹⁸ Order filed into dockets 20-401, 404, and 406 on December 18, 2020.

- Requests to residential locations **not** previously served were mostly responded to on the date requested. This is a change from 2019 when approximately a third of requests were handled on the date requested, a third 1-10 days later, and a third 11 or more days later (see Table 5). See Table 6 for reasons installs were delayed.

Table 5. MP Service Extension Completion Times All Customer Classes, Locations **Not** Previously Served

MP Year	# Requests	On Date Requested	% on Date Requested	1-10 Days Later	11+ Days Later	% Late
2013	792	612	77%	115	65	23%
2014	856	618	72%	154	84	28%
2015	1789	1060	59%	418	311	41%
2016	1469	834	57%	433	202	43%
2017	1744	1338	77%	289	117	23%
2018	2114	1371	65%	415	328	35%
2019	1510	525	35%	463	522	65%
2020	1670	902	54%	433	335	46%

Staff highlights the numbers of interest. Blue coloring shows percent data.

Table 6. Three Most Common Reasons Service Was Delayed to Locations **Not** Previously Served

MP 2019	MP 2020
Dates not updated (61.87%)	Dates Not Updated (24.49%)
Customer not ready (17.73%)	MP Delay Due to Workload (16.40%)
Weather (8.77%) ¹⁹	Customer Not Ready (5%) ²⁰

Department Comment: MP will be changing the way it accounts for delayed customers due to dates not updated for project, as most of these delays are due to customer meters installed the day after the customer is “energized.”²¹

Xcel

- 292,903 service extension requests to locations previously served were reported; like all years prior, requests were handled on the next business day.
- Requests to residential and commercial locations **not** previously served are shown in Table 7. Staff notes the decrease in average time to completion when compared to 2019, despite an increase in requests. The Company specifically directed attention to increased commercial installations, compared to 2019.

Table 7. Xcel Service Extension Times, Comparison for Locations **Not** Previously Served

Xcel Year	# Requests, Residential and Commercial	Average # Days to Complete
2013	3,329	6.5
2014	3,974	6.2
2015	4,009	4.75
2016	4,400	4.75

¹⁹ MP, initial filing into Docket 20-404 filed April 1, 2020, Appendix A p31.

²⁰ MP, initial filing, Appendix A p40.

²¹ MP, initial filing, Appendix A, p43.

2017	4,347	4.605
2018	3,630	5.965
2019	4,133	9
2020	6,490	4.725

Staff highlights the numbers of interest.

Xcel initiated their SAP system in 2018 to manage their field service processes. In 2020, the Company reported, “We are seeing improved installation times due to leveraging and adapting the processes that were put in place with the SAP rollout in 2018. The processes include continued training with better handoffs from the time a customer requests an extension until completion of the work.”²²

Department Comment: Response times in 2020 improved (were significantly lower) than 2018 – 2019 while the number of installations increased. Xcel will continue training with the new system.²³ Xcel’s filing contributed towards compliance with Order point 15.²⁴

OTP

- Between 2013 and 2018 most service extension requests to locations previously served were completed on the date requested. However, in 2019 OTP received a much larger volume of requests than in other years and, of those, 2,200 requests took 1-10 days beyond the service date requested. For 2020, the number of requests returned to near 2013-2018 levels but there was a greater percent of late completions than all previous years 2013-2019 (Table 8).
- Compared to 2019, in 2020 OTP completed a greater percentage of service extensions to locations **not** previously served on the date requested. However, OTP also completed a greater percentage of requests 1 to 10 days later than requested, compared to 2019 (Table 9).

Table 8. OTP Service Extension Times, Comparison for Locations Previously Served

OTP Year	# requests, residential and commercial locations prev. served	On date requested	1-10 days later	11+ days later
2013	2,192	2,178	13	1
2014	2,166	2,159	6	1
2015	2,004	1,999	4	1
2016	1,993	1,977	16	0
2017	1,873	1,863	8	2
2018	1,878	1,861	16	1
2019	7,898	5,652	2,239	7
2020	1,344	934	410	1

Staff highlights the numbers of interest.

Table 9. OTP Service Extension Times, Comparison for Locations **Not** Previously Served

²² Xcel, initial filing, p75.

²³ Department, reply comment in docket 21-237, filed August 16, 2021, p36.

²⁴ Order filed into dockets 20-401, 404, and 406 on December 18, 2020.

OTP Year	# requests, residential and commercial locations NOT prev. served	On date requested	1-10 days later	11+ days later
2019	261	65 (25% of requests)	145 (56%)	51 (19%)
2020	536	186 (35%)	349 (65%)	1 (<1%)

With respect to resolutions to their CIS,²⁵ OTP explained their large increase in service delays as a function of their reporting system which started counting customer service time at the initial inquiry, not necessarily when the customer was ready to have service installed. OTP modified their system to differentiate between inquiries and customers ready for installations as well as data categorized as “Locations Previously Served.” To this extent, Staff notes a large reduction in accounts reported as Locations Previously Served (see Table 8).

Department Comment: While OTP reported a significant increase in the number of extension requests made in 2019, that number returned to historic levels and response times were also “relatively consistent with past years.”²⁶ OTP’s filings contributed towards compliance with Order point 15.²⁷

D. 7826.1700 Call Center Response Times

MP exceeded the requirement to answer 80% of calls within 20 seconds during business hours (Table 10). *Outside* business hours, 51% of calls were answered within 20 seconds, a decrease from the 68% of calls answered in 2019. During the pandemic, MP reported that all but one of their support representatives transitioned to work from home.²⁸ With respect to general call center procedure, MP explained that all calls are first routed through IVR (interactive voice response); the first option is to report an outage and later, to speak to a Call Center representative. Representatives categorize incoming calls; the top five recorded categories were billing inquiry, start/stop, phone transfer, miscellaneous, and outage.

Table 10. MP Historic Call Center Data

MP Year	% Total Calls answered within 20 seconds, during business hours
2013	84.3%
2014	81.2%
2015	80.4%
2016	78%
2017	82.4%
2018	82%
2019	84%
2020	81.5%

²⁵ OTP Compliance Filing in docket 20-401, p 2-3. Filed January 18, 2021.

²⁶ Department Comments submitted to docket 21-225 on August 16, 2021 p23.

²⁷ Order filed into dockets 20-401, 404, and 406 on December 18, 2020.

²⁸ MP, initial filing, p12 and p45 Appendix A.

Xcel highlighted two groupings of calls in their Call Center data reporting (Fig. 2).²⁹ Xcel shows Service Level All Calls (Residential, business solutions center (BSC), Credit, personal account representatives (PAR), and **all** calls handled by IVR). Calls of this type received during business hours and answered within 20 seconds exceeded the 80% requirements. Xcel also shows a second grouping; this shows the same type of calls but only **outage** calls handled by IVR are included. This second grouping did not exceed the 80% threshold. The Company reported meeting or exceeding targets for January to May for both call groupings. This achievement occurred despite receiving an average 55,000 fewer calls per month in March to May, versus 2019. The company reported performance decreased from June to December, especially in September, despite receiving an average of 23,570 fewer calls per month, compared to 2019.

The Company hypothesized call volume decreased as customers responded to other pandemic issues and businesses were closed. Xcel's performance decrease may be explained by several COVID-19 related impacts:

- In March, all 360 call center agents were transferred to Work-from-Home; they had technical issues and high attrition.
- Economic downturn prompted the Company to institute hiring freezes and limit expenses, including the use of overtime.
- Civil unrest in downtown Minneapolis location prohibited employees from working for several days.
- August to October saw thousands of hours of COVID-related absence and impacted call center operations.

Xcel responded to these impacts by updating IVR with new customer query options and hiring new call center agents, noting training is taking time.

Figure 2. Xcel's Monthly Reported Call Center Data, Showing 2020 Fluctuations.

		January	February	March	April	May
20	Service Level All Calls (Residential, BSC, Credit and PAR and all calls handled by IVR)	93.1%	92.7%	92.5%	93.4%	92.3%
21	Service Level All Calls (Residential, BSC, Credit and PAR) and IVR Handled Outage Calls	82.7%	82.7%	82.2%	84.2%	82.9%

	June	July	August	September	October	November	December	2020
20	86.0%	86.8%	75.5%	74.3%	76.8%	85.5%	86.1%	85.8%
21	73.6%	74.1%	52.1%	33.9%	46.6%	66.1%	68.2%	68.4%

*Staff broke Xcel's original table into two parts, to allow for a larger font size.

²⁹ Xcel initial filing, p77.

To respond to the Commission's Order,³⁰ Xcel explained many customers prefer IVR. Thus, the Company continues to offer and include IVR in metrics. More, like MP, all calls to the Company begin by being routed through IVR. Changing reporting methods (to exclude IVR) would increase the Customer Care operations budget. In response, the Department stated that Xcel explained their use of IVR and its inclusion in their Call Center response times, the Department found Xcel to have responded to the Commission's request and fulfilled the Order's requirement.³¹

Department Comment: Additional comments were offered for Xcel's filing only. The Department suggested the problem of longer wait times for customers will 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."

Xcel Reply: The Company hired new employees but experienced a higher-than-normal attrition rate and are currently staffed at 65% capacity. As it relates to customer service, remaining new employees take longer to process calls. More, high summer temperatures resulted in more "High Bill" calls which take longer to process. The Company continues with efforts to hire more call center staff and will discuss in report filed April 2022.³²

OTP exceeded the requirement to answer 80% of calls within 20 seconds during business hours. In March 2020 all call center agents began working from home, but service levels remained high (Table 11).

Table 11. OTP Historic Call Center Data

OTP Year	Calls Offered	# calls answered within 20 seconds	% Offered Calls Answered within 20 seconds
2013	49,398	40,247	81.5%
2014	44,373	36,999	83.4%
2015	28,257	24,415	86.4%
2016	33,221	27,445	82.6%
2017	54,977	52,889	96.2%
2018	60,713	58,715	96.7%
2019	66,555	54,787	82.3%
2020	55,180	51,891	94.0%

E. 7826.1800 Emergency Medical Account Status

Per Commission's December 18, 2020 Order, point 15, utilities were required to file explanatory narratives on customer engagement plans regarding Emergency Medical Account status. All

³⁰ Order filed December 18, 2020 in docket 20-406, point 13 in which Xcel was ordered to explain why interactive voice response is included in reporting for calls answered within 20-second threshold.

³¹ Department, reply comment in docket 21-237, filed August 16, 2021, p42.

³² Xcel Energy reply comments filed into docket 21-237 on September 2, 2021 p. 6-7.

three Companies filed compliance filings in their respective 2019 SRSQ dockets in January 2021³³ including working with each other and community organizations to expand outreach.

Table 12. EMS Reported by Utilities in Compliance Filings

	EMS Communication Method or Outreach Strategy								
	Customer Brochures	Website	*CERT, ECC, & CUB websites	**Local medical facilities	Customer Service Reps.	Social Media	Bill Insert	Mail	Retail medical equipment
MP		X	X	X	X	X	X	X	
Xcel			X	X	X				X
OTP	X	X	X	X	X				

*CERT is the Clean Energy Resource Team, ECC is the Energy CENTS Coalition, and CUB is the Citizens Utility Board.

**Outreach to and capturing the attention of medical facilities was challenging, due to demands on hospital staff and resources related to the COVID-19 pandemic. Blue highlight used to distinguish among rows.

In 2020, six of OTP's Minnesota customers requested and were granted EMS. In 2020, 76 of MP's customers requested EMS. Of those, 74 were either granted (new requests) or renewed. Two were denied due to incomplete letter and a letter not being received. In 2020, 986 of Xcel's customers requested EMS; 931 were granted protection. Fifty-one denials occurred when forms were not returned and when doctors refused to certify need for protection. For all Companies, 0.1% or less of total residential customers request EMS.

With respect to the pandemic, MP stated that, "Due to the peacetime emergency and challenges customers may have faced in obtaining a letter from a physician or medical supply company, Minnesota Power put a stay on removing customers from this status on the basis of renewal starting in May 2020." Further, MP will no longer ask personal information of customers and will rely only on information in the doctor's letter.³⁴ Xcel and OTP did not comment on any EMS policy changes related to the pandemic.

Department Comment: The Department expects utilities' EMS engagement plans to increase customer awareness of EMS programs. The Department concluded that all three utilities' engagement plans were reasonable.³⁵ Therefore, while EMS engagement plans was originally a Topic Open for Comment before the Commission, the Department's finding of reasonableness leads Staff to suggest that no further action is needed.

F. 7826.1900 Customer Deposits

MP has not collected deposits since 2014. OTP collected 297 deposits as a condition of a customer being returned to service (0.6% of customers). This number marks a decline compared to 2019 in which 652 deposits were collected. OTP linked the decline to suspending

³³ MP provided information in a January 18, 2021 Compliance Filing in Docket 20-404, p 2-3. Xcel provided information in a January 19, 2021 Compliance Filing in Docket 20-406, p2. OTP provided information in a January 18, 2021 Compliance Filing in Docket 20-401, p 1-2.

³⁴ MP initial filing, appendix A, p49-50.

³⁵ Department, reply comment in docket 21-237, filed August 16, 2021, p4. The Department wrote "OTP" but Staff is under the assumption that the Department meant to write Xcel rather than OTP.

collection activities as part of pandemic response.³⁶ Xcel requested “678 deposits [0.1% of residential customers] as a condition of service for our residential customers that had filed for bankruptcy. We request these deposits upon notification from the bankruptcy court and/or the customer of their bankruptcy petition.”³⁷ Comparatively, Xcel requested 486 deposits in 2019.

G. 7826.2000 Customer Complaints

For MP, Residential and Commercial complaint resolution occurred most often by determining the complaint was not under utility control. They did not explain criteria for making this determination. For Xcel, resolution occurred most often by taking the action the customer requested, followed closely by compromising. For OTP, resolution also occurred most often by taking the action the customer requested.

Department Comment for Xcel: The Department noted a decrease in “wrongful disconnect” complaints, likely linked to the moratorium on disconnections. More, “[t]he 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 complaints that were resolved by taking the action the customer requested declined slightly from 2019 but is consistent with results from prior years.”³⁸

Related to Distributed Energy Resources (DER), the Department acknowledged that “two-way” customers, those who buy and sell energy, represent a novel scenario for the Company. Thus, the Department asked the Company to provide a discussion in Reply Comments of the possibility of developing a complaint category for DER customers by customer class.³⁹

Xcel Reply: Due to the disconnection moratorium, Xcel received fewer than normal “Wrongful Disconnect” complaints and thus, a lower complaint volume overall. April 2022 filing will show if complaints increased when disconnections resumed in August 2021. Related to DER, the Company will engage in this discussion during the customer complaint workgroup (below).⁴⁰

Table 13. IOU Complaints Comparing 2019 and 2020

	Most Common Complaint	2 nd Most Common Complaint	# Total Complaints	#Resolved Immediately
MP 2019	High Bill 69% (364)	Inaccurate Meter Read 19% (101)	525	60% (317)
MP 2020	High Bill 79% (429)	Inaccurate Meter Read 11% (61)	545	52% (284)
Xcel	Inadequate Service	Wrongful Disconnection	756	14%

³⁶ OTP initial filing, p57.

³⁷ Xcel initial filing, p81.

³⁸ Department, reply comment in docket 21-237, filed August 16, 2021, p40.

³⁹ Department, reply comment in docket 21-237, filed August 16, 2021, p43.

⁴⁰ Xcel reply comment, p7-8.

2019	60% (451)	17% (131)		(106)
Xcel 2020	Inadequate Service 57% (246)	Bill Error 16% (70)	430	14% (62)
OTP 2019	Other 68% (19)	High Bill 18% (5)	28	54% (15)
OTP 2020	Other 63% (19)	High Bill 30% (9)	30	80% (24)

In the table above, the numbers in parentheses are the number of complaints recorded in each category listed.

1. Working Group

In 2019, Staff noticed that high percentages of complaints were logged under seemingly ambiguous titles like “Other” and “Inadequate Service.” In response, the Commission ordered formation of a work group to facilitate collaboration among Utilities, the Department, and Commission staff.⁴¹

All Utilities used the following text to describe the work group, “Commission Staff, including the Consumer Affairs Office, convened a work group meeting on Monday, March, 1, 2021 with the Department of Commerce, Xcel Energy, Minnesota Power, and Otter Tail Power to review and discuss current complaint categories used in annual Safety, Reliability, and Service Quality (“SRSQ”) reports. Minnesota Rule 7826.2000 was reviewed along with the current categories used by each of the utilities and the Consumer Affairs Office. The group agreed to work together to further refine definitions for existing categories to allow for greater specificity and seek consistency, where possible. As part of this review, additional categories may be considered based on emerging topics of interest. Quarterly meetings will continue in 2021 with the objective of establishing a recommendation for use with the next calendar year (2022) to align with SRSQ reporting cycles.”⁴² The group’s second meeting was held June 2, 2021. The group explored use of sub-categories to further define reported complaints. The group planned to have two group members create “test” sub-categories for which all would review, modify as needed, and assess the fit of those subcategories to each group member’s unique circumstances.

Department Comments: The Department found that MP and Xcel fulfilled Order point 16, related to working collaboratively to add specificity to complaint reporting categories. The Department did not comment on OTP’s fulfillment.

Staff Note: Staff plans to convene one to two more meetings of the workgroup before April 2022. The is to finalize subcategories for use in complaint reporting; this entails agreement of subcategories and definitions for those categories across meeting participants. For example, utilities must report number and percentage of complaints received for the category of

⁴¹ “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 categories, with the goal of establishing them by the April 1, 2021 reporting deadline.” Order filed Dec. 18, 2020 in docket Nos. 20-401, 404, & 406 para.16.

⁴² OTP initial filing, p38; MP initial filing, p31-32 and p53 Appendix A; Xcel initial filing, p83.

inadequate service; this category could be subdivided for such things as reliability or call center difficulties. Utilities will then report using subcategories in their April 2022 or 2023 filings.

H. Electronic Utility-Customer Interactions

The Commission ordered⁴³ utilities to provide greater detail on electronic means of customer communication. Therefore, 2020 is the first of two years in which electric IOUs file information on customer communication beyond their call centers. Where utilities provided additional data on call center subject, Staff include those data to invite comparison.

Table 14. Most Common Subject of Electronic Communications

	#1 Most Common	#2	#3	#4	#5
MP online	Energy Assistance	Billing Inquiry	Miscellaneous	Not Specified	Start / Stop
MP call center	Billing Inquiry	Start / Stop	Phone Transfer	Misc.	Outage
Xcel	Billing	Start / Stop / Transfer	MyAccount	Other	Outages
OTP*	My Account	Enroll in EMP (Even Monthly Payment)	Other	Payment Plans	Rebates / Programs / Financing

*OTP subjects reflect "Contact Us" section of website. OTP also received 606 requests from their Self-Service website area regarding, in descending order: meter reading, starting service, and change of mailing address. For all website visits and social media, OTP is unable to separate by state, so info reported includes ND and SD.⁴⁴ Color used to separate among utilities only.

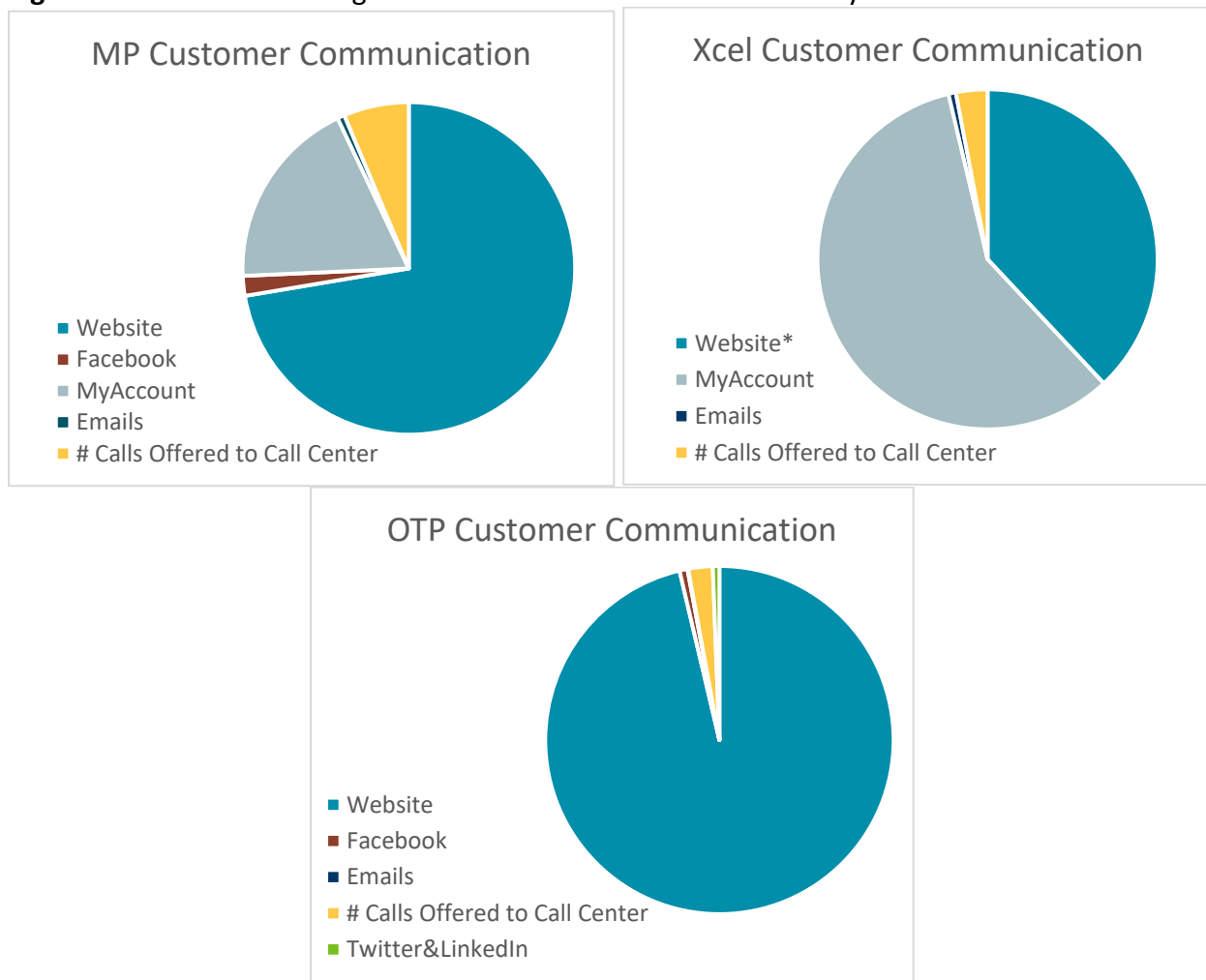
Table 15. Visits to Communication Platforms, Total for 2020

	MP	Xcel	OTP
# Visits to Website	1,314,540	12,681,427	2,349,795
# Visits to Facebook	35,111	(website, Facebook, & Twitter)	18,042
# Visits to MyAccount	339,242	19,432,738	
# Visits to other Electronic Communication Platforms			(Twitter) 7,874 (LinkedIn) 7,067
# Emails Received	12,722	235,210	1,688
# Calls Offered to Call Center	115,251	*997,622	55,180

"Calls Offered to Call Center" included to compare to new data on electronic communication. *Number is All calls offered to Agents from Residential, Business Service Center, Credit, and PAR. Blue highlight to distinguish rows.

⁴³ Commission Order in Dockets 20-401, 404, 406 filed Dec. 18, 2020 Point 14.

⁴⁴ OTP initial filing, p37.

Figure 3. Pie Charts Showing Customer Communication Methods by Electric IOU

*Xcel includes Facebook and Twitter with their count of website visits

Department Comments: Additional measures of electronic utility-customer interactions can provide a more complete picture of how customers experience utilities' customer service. To this extent, the Department requested: (1) continued reporting of information on electronic customer-utility interaction⁴⁵ (2) additional information in "annual reports for the next two reporting cycles"⁴⁶ (Table 16) and (3) utility reply comments in this docket addressing website chat features and use of internal or third-party website monitoring. It is Staff's understanding that the Department will use these data to set baseline levels for what they are terming "web-based service metrics." The Commission may wish to ask the Department to explain why these metrics and degree of significance were chosen.

Table 16. Department Recommendation of Additional Metrics for Annual Reports

Percentage Uptime		[to second decimal]
	General Website	XX.XX%
	Payment Services	XX.XX%

⁴⁵ As was ordered in docket Nos. 20-401, 404 and 406. Order filed December 18, 2020 see para.14

⁴⁶ Department Comments submitted to docket 21-225 on August 16, 2021 p5.

	Outage map &/or Outage Info page	XX.XX%
Error Rate Percentage		[to third decimal]
	Payment Services*	XX.XXX%

* "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."⁴⁷

Utility Replies:

Additional Metrics: MP and Xcel are open to reporting additional website metrics in future annual SQSR reports. OTP can provide uptimes of website and outage map information and, to the extent feasible, information for payment services based on collaboration with third-party provider.

Chat: MP replied that their website currently has no chat feature. Xcel and OTP do not have a chat feature but are open to creating one (Xcel) and are reviewing possibility of implementation, including necessary staff time resources (OTP).

Monitoring: MP uses Google Analytics and Pingdom for monitoring. Xcel works with third-party and in-house monitoring teams but uses in-house staff to address critical website failures. OTP uses a third party to monitor their website for errors. Staff notes that reporting of errors, per the Department's recommendation, would require coordination with third parties.

Timing: All three utilities suggested filing the Department's requested data in their April 2023 reports. The Department agreed with OTP's request to begin reporting website use metrics in the 2022 data, filed in 2023."⁴⁸ OTP thanked the Department for this agreement.⁴⁹ Xcel also suggested that if data are used for benchmarking, three years' worth of data (versus the two suggested by the Department) are used.

I. Public Facing Summaries

All three utilities submitted a second iteration of their public facing summaries. Staff will comment on these in analysis. Summaries are included as Appendix B.

V. Staff Analysis

The following analysis is related to the service quality portion of utilities' annual reports only. This year's service quality data offers insight on the utilities' and customers' experiences during the COVID-19 pandemic. Overall, service quality improved in 2020 compared to 2019 for service extensions and involuntary disconnections. The latter was likely impacted by the Commission's moratorium on service disconnections which expired in August 2021. However, Xcel reported approximately double (1,400 more) disconnections in the months of January- March 2020 than

⁴⁷ Department Comments submitted to docket 21-225 on August 16, 2021 p5.

⁴⁸ Letter filed by the Department into docket 21-225 on October 5, 2021, p3.

⁴⁹ Letter filed by OTP into docket 21-225 on October 15, 2021, p2.

in 2019. The Commission may wish to ask Xcel to explain this unique increase in their service territory.

Utilities saw service quality performance issues which were likely exacerbated by the pandemic. Work from home and staffing negatively impacted call center performance for OTP and Xcel compared to 2019. It is unknown whether the service disconnection moratorium or other priorities disincentivized customers given lower enrollment numbers for CWR protection and payment plans. Despite pandemic impacts increasing the number of unread meters compared to previous years, only Xcel Energy had 136 more meters unread for 12+ months in 2020 than 2019.

Call Center- As noted earlier, Xcel had high attrition in their call centers and though Xcel's lack of staffing is a unique problem among the three electric IOUs, Xcel aligns more broadly with trends of workforce shortages across Minnesota. The Minnesota Department of Employment and Economic Development (DEED) links shortages both to the pandemic and longer-term factors of retirement, lack of younger workers to fill retirees' positions, and years of economic growth.⁵⁰ The ability to help customers is crucial and Staff echoes the Department's concern with the high levels of attrition and increased call handle times. **See Decision Option 4.**

Electronic Customer Communication- In 2020 each utility presented its first dataset on electronic customer communications. Shown by the difference between volume of telephone calls and electronic interaction, the way utilities and customers communicate is changing. Early trends indicate that continued data collection is warranted (**See Decision Options 2-3**):

- Many communications were categorized by utility staff as "other." Thus, greater specificity may be needed in reporting, like those discussions of specificity taking place in the complaint workgroup. Perhaps categories decided in the workgroup could be used as categories in subsequent years' reports.
- Energy assistance was the most common subject for MP's electronic communications. This underscores the importance of offering customer assistance online. More, only MP provided data on call center call subject; this was not required. However, understanding the difference in how customers use call centers and online resources could help ensure resources and staff training are directed appropriately. Therefore, the Commission may wish to require all utilities to categorize and report the top five most common categories of call center calls.
- As we better understand electronic means of customer communication, it is important that staff are appropriately trained and content is regularly updated, as would be done for the call centers. More, the Commission may consider requiring feasibility discussion for a chat function, as discussed by the Department but not currently offered by utilities.

Table17. Public Facing Summaries: Additions from 2019 and Staff Suggestions

	2020 Updates	Customer Help Information	Define terms in future summaries
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⁵⁰ <https://mn.gov/deed/newscenter/publications/trends/september-2021/workforce-shortages.jsp>

MP	New eye-catching graphics, photographs, and font choices.	Included “How to Get Help” in 2020.	Reliability and interruption
Xcel	Well-written and easily digestible. Presentation of information, like font and graphic size, could be improved.	Could add in future summary.	Reliability and interruption
OTP	Included additional statistics for the MN portion of service territory.	Added in 2020. Could add more on CWR, energy assistance, & payment plans.	Reliability and interruption

Public facing summaries are found in Attachment B. Summaries are discussed in **Decision Option 6**.

Utility service reliability which is also reported in the annual SQSR reports will be presented to the Commission later this year. At this time, the Commission is taking action on the service quality items in these reports. The Department recommends, and staff supports, accepting the service quality report details (**Decision Option 1**) and requiring additional electronic customer communication metrics in future reports. The Commission will need to decide whether to use 2 or 3 years of this data to establish benchmarks (**Decision Options 2-3**). The Commission will also need to determine if it will require additional information about Xcel’s call center, especially questions of employee retention and impacts on service (**Decision Option 4**). Staff continues to lead a Complaint Working Group; the Commission will need to decide if it will task the group with considering complaints related to Xcel’s DER and perhaps reporting those as a subcategory in forthcoming annual SRSQ reports (**Decision Option 5**). Finally, utilities have created several iterations of their public facing summaries. The Commission will need to decide if it wishes to give further direction related to the publication of those summaries (**Decision Option 6**).

VI. Decision Options

The following actions are related to the service quality portion of utilities’ annual reports only:

1. Accept Minnesota Power’s, Otter Tail Power’s, and Xcel Energy’s Annual Service Quality Reports [Utilities, Department]
2. a. Utilities shall provide the following new information regarding electronic utility-customer interaction beginning with the reports filed in April 2023: [Department, Xcel, MP, and OTP to the extent possible]

Percentage Uptime		[to second decimal]
	General Website	XX.XX%
	Payment Services	XX.XX%
	Outage map &/or Outage Info page	XX.XX%
Error Rate Percentage		[to third decimal]
	Payment Services*	XX.XXX%

* “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.”

[AND]

2b. Utilities shall provide additional information in their annual reports for the next **two** reporting cycles, to build baselines for web-based service metrics.

[Department]

[OR]

2c. Utilities shall provide additional information in their annual reports for the next **three** reporting cycles, to build baselines for web-based service metrics.

[Xcel]

3. Utilities shall continue to provide information on electronic utility-customer interaction such that baseline data are collected:
 - a. Yearly total number of website visits;
 - b. Yearly total number of logins via electronic customer communication platforms;
 - c. Yearly total number of emails or other customer service electronic communications received; and
 - d. Categorization of email subject, and electronic customer service communications by subject, including categories for communications related to assistance programs and disconnections ~~as part of reporting under Minn. R. 7826.1700.~~ [Department, Staff wording and modification]
4. Xcel shall 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. [Department]
5. Require Xcel to bring discussions of adding a “DER Complaint” category to the Complaint workgroup. [Department, Staff]
6. Utilities shall file public facing summaries with their annual SRSQ reports. Utilities shall work with the Executive Secretary to publish those summaries in locations visible to consumers. [Staff]