



414 Nicollet Mall  
Minneapolis, Minnesota 55401-1993

May 1, 2020

Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7th Place East, Suite 350  
St. Paul, Minnesota 55101

—VIA ELECTRONIC FILING—

RE: ANNUAL REPORT AND REQUEST FOR COMMISSION FINDING REGARDING  
THE CUSTOMER COMPLAINT PERFORMANCE SERVICE QUALITY PLAN  
DOCKET NOs. E,G002/M-02-2034, E,G002/M-12-383, and  
E002/M-20-\_\_\_\_\_

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission this Annual Report on our service quality results for the 2019 performance year. We submit this report pursuant to our Quality of Service Plan (QSP) Tariff, which was amended by the Commission's August 12, 2013 Order (2013 Order) in the above-noted dockets. In addition, the Company submits this petition requesting the Commission find that 129 of the complaints submitted to the Commission's Consumer Affairs Office (CAO) should not be counted in the Customer Complaints metric in its Quality of Service Plan (QSP) tariff as they do not fit the definition of "Customer Complaints" filed by a "Customer" under the QSP tariff, nor are they the type of complaint contemplated when the Customer Complaints metric was initially developed.

We have electronically filed this document with the Commission, and copies have been served on the parties on the attached service list. Please contact Pamela Gibbs at [pamela.k.gibbs@xcelenergy.com](mailto:pamela.k.gibbs@xcelenergy.com) or (612) 330-2889, or Gail Baranko at [gail.baranko@xcelenergy.com](mailto:gail.baranko@xcelenergy.com) or 612-330-6935 if you have any questions regarding this filing.

Sincerely,

/s/

GAIL A. BARANKO  
REGULATORY MANAGER

Enclosure  
c: Service List

STATE OF MINNESOTA  
BEFORE THE  
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
Joseph K. Sullivan	Commissioner
John Tuma	Commissioner

2019 QUALITY OF SERVICE PLAN TARIFF  
ANNUAL REPORT

DOCKET NOS.  
E,G002/CI-02-2034 AND  
E,G002/M-12-383

IN THE MATTER OF NORTHERN STATES  
POWER COMPANY'S REQUEST FOR A  
COMMISSION FINDING REGARDING THE  
CUSTOMER COMPLAINT PERFORMANCE IN  
THE QUALITY OF SERVICE PLAN TARIFF

DOCKET NO. E002/M-20-\_\_\_\_

**ANNUAL REPORT  
AND PETITION**

### INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission this Annual Report on our service quality results for the 2019 performance year. We submit this report pursuant to our Quality of Service Plan (QSP) Tariff, which was amended by the Commission's August 12, 2013 Order (2013 Order) in the above-noted dockets. In addition, the Company submits this petition requesting the Commission find that 129 of the complaints submitted to the Commission's Consumer Affairs Office (CAO) should not be counted in the Customer Complaints metric in its Quality of Service Plan (QSP) tariff as they do not fit the definition of "Customer Complaints" filed by a "Customer" under the QSP tariff,<sup>1</sup> nor are they the type of complaint contemplated when the Customer Complaints metric was initially developed.

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<sup>1</sup> See Xcel Energy Rate Book, Section 6 Sheets 7.1 to 7.11

We performed within the performance standards for all metrics in 2019, when considering the definitions of “Customer” and “Customer Complaint” under the QSP Tariff.

<b>Measure</b>	<b>Standard</b>	<b>2019 Performance</b>
Customer Complaints to PUC	≤ 363 complaints*	396 complaints submitted to CAO, but only 267 meet QSP definition of “Customer Complaint”
Telephone Response Time (percent of calls answered in ≤ 20 sec)	≥ 80%	90.85%
Electric Reliability – SAIDI	≤ 133.23 min	76.66 min
Electric Reliability – SAIFI	≤ 1.21 outage events	0.70 outage events
Gas Emergency Average Response Time	≤ 60 min	40.11 min
Accurate Invoices	≥ 99.3%	99.83%
Invoice Adjustment Timeliness	≤ 2.35 billing periods	1.57 billing periods

\*Customer complaint standard is ≤ .2059 complaints per 1,000 customers. This number reflects the calculation for 2019.

With regard to the Customer Complaint metric, in December 2019, the Company experienced a dramatic increase in PUC complaints from the Commission’s Consumer Affairs Office (CAO). From January through November 2019, the Company averaged 23 complaints per month. In December 2019, however, the CAO received 141 complaints about the Company. Of those 141 complaints, 129 were filed by solar installers with 128 originating from one solar installer who was installing facilities on behalf of customers in our Solar\*Rewards program.

Over the years, we have consistently demonstrated our commitment to quality and reliable service to our customers. The Customer Complaint metrics measure “the number of Customer Complaints submitted [to] the Commission’s [CAO].” Historically, we have overperformed relative to this metric by simply counting all complaints submitted to the CAO and not parsing whether or not they were genuine “Customer Complaints” as the term is defined in the QSP tariff. In light of the dramatic increase in complaints submitted to the CAO in December 2019, we believe it is critical to examine the language and intent of the QSP tariff in order to determine the actual number of “Customer Complaints” that should be counted under the metric. The Customer Complaints metric should measure true underperformance as contemplated by the language of the QSP tariff, thereby reflecting an increase in customer complaints (and a corresponding decline in the Company’s performance),

rather than the inclusion of complaint types that are not part of the applicable definitions and were not considered in setting this performance standard.

Several provisions of the QSP tariff support the Company's position on the Customer Complaint metric. Those provisions:

- Provide that the Customer Complaints metric “measures the number of Customer Complaints submitted [to] the Commission’s [CAO] [emphasis added]”.
- Define “Customer Complaint” as “any complaint submitted, in writing, by US Mail, e-mail, or by fax, registered by the Minnesota Public Utilities Commission’s Consumer Affairs Office to the Company, regarding a complaint submitted by an Xcel Energy customer in which the customer states a grievance related to the Company’s provision of service to that customer” [emphasis added]; and
- Define “Customer” as “an electric or natural gas customer that receives a bill for utility service from the Company or a representative of that customer. A representative includes an individual designated with Power of Attorney for the Customer, an attorney retained to represent the Customer, or an individual authorized by the Customer to act on his/her account” [emphasis added].

Here, the solar installers filed 129 complaints on behalf of customers’ Solar\*Reward projects, but not with the necessary authorizations required under the definition of “Customer.” Moreover, all but one of the 129 complaints came from a single solar installer and were submitted on mostly technological complaints about our Minnesota Distribution Energy Resource Interconnection Process (“MN DIP”) portal, instead of complaints about the “Company’s provision of service to that customer” as required by the definition of “Customer Complaint.” As such, those complaints do not meet the definition contemplated under the QSP tariff and should not be counted for the purposes of measuring underperformance relative to the Customer Complaint metric. We therefore request the Commission concur with our reading of the QSP tariff and omit these 129 complaints from the Customer Complaint metric. If these 129 complaints are omitted from the analysis, our performance reflects 267 “Customer Complaints”, which is well below the metric of  $\leq 363$  complaints.

## **I. SUMMARY OF FILING**

A one-paragraph summary of this filing accompanies this Petition pursuant to Minn. R. 7829.1300, subp. 1.

## **II. SERVICE ON OTHER PARTIES**

Xcel Energy has filed this document in eDockets and served a summary of the filing on all parties on Xcel Energy's miscellaneous electric service list, pursuant to Minn. R. 7829.1300, subp. 2.

## **III. GENERAL FILING INFORMATION**

Xcel Energy provides the following required information pursuant to Minn. R. 7829.1300, subp. 3.

### **A. Name, Address, and Telephone Number of Utility**

Northern States Power Company, doing business as Xcel Energy  
414 Nicollet Mall  
Minneapolis, MN 55401  
(612) 330-5500

### **B. Name, Address, and Telephone Number of Utility Attorney**

Mara K. Ascherman  
Senior Attorney  
Xcel Energy  
414 Nicollet Mall – 401 8<sup>th</sup> Floor  
Minneapolis, MN 55401  
(612) 215-4605

### **C. Date of Filing and Date Standards Take Effect**

The date of this filing is May 1, 2020. Xcel Energy respectfully requests that the Commission find that the solar installer-related complaints should not be counted when measuring our 2019 PUC customer complaints performance per the QSP tariff.

### **D. Statute Controlling Schedule for Processing the Filing**

No specific statute imposes a schedule controlling the processing of this filing. Pursuant to Minn. R. 7826.1300, this report is to be filed as a miscellaneous filing

under Minn. R. 7829.0100, subp. 11. Under Minn. R. 7829.1400 governing miscellaneous filings, initial comments are due within 30 days of filing, with reply comments due ten days thereafter.

**E. Utility Employee Responsible for Filing**

Gail Baranko  
Regulatory Manager  
Xcel Energy  
414 Nicollet Mall – 401 7<sup>th</sup> Floor  
Minneapolis, MN 55401  
(612) 330-6935

**IV. DESCRIPTION AND PURPOSE OF FILING**

This filing has two purposes. First, the filing of our 2019 Annual Report, as required by the QSP tariff. Second, a request that the Commission find the 129 solar installers' complaints should not be counted for the purposes of calculating the Company's performance under the QSP Customer Complaints metric. The Commission does not typically accept or otherwise act on this Annual Report. To the extent it does so this year, we request that the Commission accept our report—excluding the 129 complaints that were filed with the CAO but do not meet the definitions under the QSP Tariff—and thereby find that the Company met its goals in each of the seven metrics measured.

**A. FILING OF 2019 ANNUAL REPORT**

*1. 2019 Performance*

We performed within the performance standards for all metrics in 2019, with the exception for customer complaints as already discussed and detailed further below. Attachment A to this filing provides the monthly and YTD performance for each metric. Attachments B through H contain additional detail on performance consistent with previous Annual Reports.

**TABLE 1: 2019 QSP TARIFF PERFORMANCE**

Measure	Standard	2019 Performance	Attachment with Details
Customer Complaints to PUC	≤ 363 complaints*	396 complaints submitted to CAO, but only 267 meet QSP definition of “Customer Complaint”	B
Telephone Response Time (percent of calls answered in ≤ 20 sec)	≥ 80%	90.85%	C
Electric Reliability – SAIDI	≤ 133.23 min	76.66 min	D
Electric Reliability – SAIFI	≤ 1.21 outage events	0.70 outage events	D
Major Event Days			E
Gas Emergency Average Response Time	≤ 60 min	40.11 min	F
Accurate Invoices	≥ 99.3%	99.83%	G
Invoice Adjustment Timeliness	≤ 2.35 billing periods	1.57 billing periods	H

\*Customer complaint standard is ≤ .2059 complaints per 1,000 customers. This number reflects the calculation for 2019.

## 2. 2019 Customer Outage Credits

The QSP Tariff requires that we pay a \$50 credit to customers experiencing six or more outages unrelated to major event days (MEDs) in the performance year, and those experiencing an outage lasting 24 hours or more.

In addition, the QSP Tariff also provides a credit for customers who have continuously resided at an address experiencing consecutive years of interruptions according to the below terms:

- A \$75 credit to customers experiencing 5 or more interruptions in 2 consecutive years;
- A \$100 credit to customers experiencing 4 or more interruptions in 3 consecutive years; and
- A \$125 credit to customers experiencing 4 or more interruptions in 4 or more consecutive years.

In addition, the QSP Tariff further provides that large municipal pumping customers on the A41 Tariff receive \$200 credits for each outage unrelated to MEDs lasting more than one minute per year. Similarly, small municipal pumping customers on the A40 Tariff receive \$100 credits for each outage unrelated to MEDs lasting more than one minute per year.

**TABLE 2: 2019 OUTAGE CREDITS**

	<b>2019 Credits</b>	<b>Dollars</b>
Six or More Service Outages	1,964	\$98,200
Outages Lasting 24-Hours or Longer	306	\$15,300
Consecutive Years of Outages	815	\$71,525
Tracked Small Municipal Pumping Outages (A40)	878	\$87,800
Untracked Small Municipal Pumping Outages (A40)	261	\$40,455
Tracked Large Municipal Pumping Outages (A41)	491	\$98,200
Untracked Large Municipal Pumping Outages (A41)	203	\$78,358
<b>TOTAL</b>	<b>4,918</b>	<b>\$489,838</b>

As previously discussed in the above-referenced dockets, the Company is unable to track all outages for all of our customers due to the constraints of our current distribution infrastructure. As a result, there are approximately 203 large municipal pumping meters (on the A41 Tariff) who may have had untracked outages that were greater than one minute and equal to or less than five minutes. There are also approximately 261 small municipal pumping meters (on the A40 Tariff) who may have had untracked outages that were greater than one minute and equal to or less than five minutes. Thus, we issued proxy credits for these customers who may have had untracked momentary outages.

To determine the large municipal pumping customer proxy credit, we used the 2019 outages that were greater than one minute and equal to or less than five minutes that we can track for our other municipal pumping customers and determined that, on average, other large municipal pumping customers received \$386 (which is equal to 1.93 outages per year at \$200 per outage) in credit for outages of this duration. We recently issued these customers a letter and a \$386 bill credit. The letter provides customers an opportunity to provide documentation for additional credits if they believe they had more than two qualifying outages in 2019.

To determine the small municipal pumping customer proxy credit, we used the 2019 outages that were greater than one minute and equal to or less than five minutes that we can track for our other small municipal pumping customers and determined that,



on average, other small municipal pumping customers received \$155 (which is equal to 1.55 outages per year at \$100 per outage) in credit for outages of this duration. We recently issued these customers a letter and a \$155 bill credit. The letter provides customers an opportunity to provide documentation for additional credits if they believe they had more than three qualifying outages in 2019.

## **B. Request for Finding that 129 Complaints are Not “Customer Complaints”**

### *1. Background - Quality of Service Plan (QSP) Tariff Complaints Metric*

The Customer Complaints metric pre-dates the QSP tariff and was originally established as part of the Northern States Power Company and New Century Energies merger.<sup>2</sup> This metric measured complaints received by the PUC and originally set the performance threshold at 450 complaints per year.

The QSP Tariff stems from negotiations and the resulting settlement to the Commission’s 2002 Service Quality investigation<sup>3</sup> and carried forward the customer complaint metric and performance threshold. It was envisioned that the Commission’s CAO staff would continue to refer complaints to the Company in the manner it always had, which ensured the measurement tracked changes in service quality rather than changes in method of counting or process.<sup>4</sup>

The present customer complaints performance threshold was established through an extensive negotiation and procedural process with the Department of Commerce, Commission staff, and other interested parties as part of a comprehensive update to our QSP tariff – driven in part by various Commission Orders during the 2012-13 timeframe that required updates to some of the metrics.<sup>5</sup> As part of this proceeding, the metric maintained the historic customer complaints definition, which was and continues to be the number of complaints registered with the CAO “regarding a complaint submitted by an Xcel Energy customer in which the customer states a grievance related to the Company’s provision of service to that customer.”

Consistent with the QSP tariff’s intent to ensure the Company maintains adequate service, we also proposed to establish or recalibrate each metric’s performance

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<sup>2</sup> See Order, *In the Matter of the Application of Northern States Power Company for Approval to Merge with New Century Energies, Inc.* Docket No. E,G002/PA-99-1031 (June 12, 2000)

<sup>3</sup> See Docket No. E,G002/CI-02-2034

<sup>4</sup> Ibid. October 15, 2004 Compliance filing providing details on method to count complaints.

<sup>5</sup> See Docket Nos. E,G002/CI-02-2034 and G002/CI-08-871.

threshold based on actual historic performance or industry standards.<sup>6</sup> The outcome of this process was Commission approval of our proposed 1.5 standard deviations from our seven-year average historical customer complaints performance as our proposed performance threshold.<sup>7</sup> The effect of this change *reduced* the number of allowable complaints before triggering a financial penalty. The Commission approved our present customer complaint performance threshold of  $\leq 0.2059$  complaints per 1,000 customers in its August 12, 2013 Order, beginning with the 2013 performance year. The performance threshold for 2019 is 363 complaints.

## 2. *Background on December 2019 Complaints*

### a. Changes to Minnesota's Interconnection Process

On January 24, 2017, the Commission issued its *Order Establishing Workgroup and Process to Update and Improve State Interconnection Standards*. Through a lengthy stakeholder process (known as the Distributed Generation Workgroup), Minnesota's interconnection process, applications, data submittal and agreements for interconnection were reviewed and established by a wide variety of stakeholders. As a result, on August 13, 2018, the Commission adopted the MN DIP which transitioned the Company's interconnection process beginning on June 17, 2019.

The Company has a significant number of Distributed Energy Resources (DER) interconnections, including a significant volume of annual applications. In addition, for the past six years, we have had a robust system (SalesForce) in place that interacts with several other technological system tools (such as our billing system) to manage DER interconnection and program applications. The MN DIP transition necessitated several changes to these systems following finalization and approval by the Commission.

Given the short time frame between MN DIP approval and launch, we created an interim technological solution in order to meet the June 17, 2019 implementation date. This interim solution allowed the launch of the process and provided additional time for system modifications, with input from installers using the system, as these updates were finalized. We implemented the new online portal for the DER interconnections on December 9, 2019. The new application portal provides an

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<sup>6</sup> Defined as the number of registered customer complaints submitted to the CAO. *See* Petitions, Docket Nos. E,G002/M-02-2034 and E,G002/M-12-383 (April 16, 2012) and (March 27, 2013).

<sup>7</sup> *See* Order, *In the Matter of the Petition of Northern States Power Company d/b/a Xcel Energy for Approval of Amendments to its Natural Gas and Electric Service Quality Tariffs*, Docket Nos. E,G002/CI-02-2034 and E,G002/M-12-383 (August 12, 2013).

enhanced level of transparency for end-users and improved notifications to both the installer and customer.

The new MN DIP process includes screenings and differing types of analysis for interconnection dependent upon project size and complexity. It also altered timelines for review and how engineering analysis is conducted for successful distribution interconnection. In the first six months of transitioning to this process, the Company received over 1,600 new applications – many of which were taking advantage of the final years for the federal tax credit. The volume of new applications looking to be completed in a short time frame under a new process unfamiliar to all stakeholders caused challenges for successful implementation of the MN DIP. However, the Company mitigated these challenges by actively working with the installer community during this transitional period with ongoing training and one-to-one communications with our dedicated solar teams.<sup>8</sup>

#### b. CAO Complaints

The Company participates in several stakeholder discussions initiated by the Commission, conducts several training opportunities, and works with installers on a daily basis to work through challenges with interconnection applications. We also utilize an email address where installers can request help, note concerns, or generally contact our solar team for help with online applications, questions with the process, etc. On a typical day, the program can receive up to 70 emails or direct phone calls by installers. Our goal is to be able to help customers and installers through the process and can often resolve their issues or concerns while on the call or within one to two business days.

On December 17, 2019, the Company began to receive several complaints through the CAO and initiated primarily by one solar installer. In fact, all but one of the 129 complaints at issue were submitted to the CAO by a single solar installer (the application agent).<sup>9</sup> Customers were not copied on these complaints, and we are unsure whether customers had any role in initiating or requesting these complaints. To try to determine if the customers themselves had a complaint or concern, we actively reached out to approximately 15 percent of the customers who had

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<sup>8</sup> See Xcel Energy Compliance Filing, *In the Matter of Updating the Generic Standards for the Interconnection and Operation of Distributed Generation Facilities Established Under Minn. Stat. § 216B. 1611*, Docket No. E-999/CI-16-521 (March 2, 2020).

<sup>9</sup> The other complaint from a solar installer was from an installer unfamiliar with the MN DIP process, who submitted one complaint in December regarding concern with how to continue the engineering process when moving to supplemental review.

complaints filed on their Solar\*Rewards projects to ask if they had concerns about their solar application or were aware of the complaints filed. Of the customers we were able to connect with, none of them were aware that a complaint has been filed.

The installer often noted in their complaints that we were non-responsive to their concerns or questions. Prior to the December complaints, we heard minimal concern from the other (approximately 370) installers who participate in our Solar\*Rewards program regarding our lack of responsiveness to any communications, even during regular stakeholder and education forums. To be responsive to this specific installer's concerns, since January 15, 2020, we have standing scheduled biweekly meetings with the installer to address any concerns they may have (meetings are held if installer has items to discuss).

Additionally, of the 128 complaints filed by the one solar installer, on average, the amount of time between the installer sending a request to the Company and then sending a complaint to CAO was one day. And in some instances, the installer submitted the complaint to the CAO after the request had been resolved by the Company.

We have categorized these 128 complaints into two categories: (1) Online Portal Issues; and (2) Engineering Delays.

*i. Online Portal Issues*

Eighty-five percent (110) of the complaints filed were due to issues and concerns with our online portal. Further, of these 110 complaints, 72 were identical except for the listing of different customer accounts. These identical complaints were a result of a system enhancement from the MN DIP that was not fully corrected when the portal went live. Our online portal inaccurately released an automatic email to installers requesting an action by the installer to move an application forward in the portal. These projects already had their meters installed and witness testing<sup>10</sup> was completed, so no action was actually needed by the installer or customer. Instead, the final Permission to Operate letters should have been sent rather than an email requesting an action. The Company moved these projects forward manually so their Permission

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<sup>10</sup> The Company requires interconnection customers to conduct commissioning of their distributed generation interconnection sites prior to allowing the system to be made ready for normal operation. Xcel Energy will witness these tests to review actual operation with what was submitted to the company during engineering review. These procedures are outlined in the MN DIP Section 5.7 under "Inspection, Testing, Commissioning and Authorization."

to Operate letter was sent. Yet, as is our process, these customers were already interconnected and receiving the benefits of both the Solar\*Rewards incentive and net metering. While the Permission to Operate letter is a requirement of MN DIP, it is not a driver for the Solar\*Rewards benefit. This system enhancement issue has been corrected. We included details on how to address further issues such as these in our update email sent monthly to installers but received no further requests from other installers.

The remaining 38 portal issues were due to meter orders and incomplete steps with the portal itself. For example, the installer sent complaints regarding the readiness of their meters. As a result of MN DIP, this automated process now required the full completion of paperwork before the meter could be installed. If an installer fills out the paperwork in the wrong order, the meter was unavailable. Further, additional complaints were submitted due to the portal stating the application was held due to “incomplete steps” that had to be manually moved forward by Xcel Energy staff. These system enhancements, required as a result of the MN DIP process, have since been corrected.

#### *ii. Engineering Delays*

Eighteen of the submitted complaints were due to engineering delays. In these instances, the Company had missed one of the required application deadlines and had yet to provide an extension notice to the applicant including the reason for the delay as contemplated by Section 10, First Revised Sheet 95.

#### *3. Resolution*

The Company reached out to the installer on several occasions to resolve their concerns. Although they admit we were in compliance for a number of these complaints (they intended to only submit complaints when we were out of compliance), they maintained we were missing deadlines and delaying their process and therefore should be held accountable. We have continued to work with this installer to help them through the MN DIP process and understand what deadlines exist as many of their complaints (such as portal issues) were not dictated by a MN DIP deadline.

We have resolved every CAO complaint from this installer to-date; and we have made adjustments to our process as a result of their concerns as we note below:

- *Permission to Operate (PTO) Letters* – we have adjusted the software for our online portal so that the PTO letter is submitted immediately after interconnection;

- *Meter Orders* –we have removed this initiation step and started the meter order earlier in the process to match how applicants were completing these steps;
- *Incomplete Steps* –These interface problems have been resolved with a few exceptions and we are in contact with these affected parties; and
- *Engineer Notice* – we have begun to manually notify installers when a deadline will be missed and how many additional days the Company will need for completion as required by the MN DIP.

#### 4. *Proposal to Report Solar Installer Complaints in MN DIP Docket*

We agree that solar installer complaints about the new MN DIP process can and should be addressed.

It's important to note that the Company actively tracks customer complaints for solar issues. Complaints for Solar\*Rewards Community are filed as part of the Annual Reporting Requirements under Docket No. E002/M-13-867 filed on April 1 of each year and the Company will often address concerns and issues through complaints in their annual reporting process for Solar\*Rewards under Docket No. E002/M-13-1015 filed June 1 of each year. This means that if a *customer* (as that term is defined in the QSP tariff) complains about a solar issue, that complaint could be counted both in the Solar\*Rewards Community or other DER annual filings, as well as the QSP tariff filing.

The Company believes complaints by installers about our MN DIP process are not “a complaint submitted by an Xcel Energy customer in which the customer states a grievance related to the Company’s provision of service to that customer” as contemplated by the QSP tariff but should be reported on and addressed in some manner. In the existing docket for compliance of interconnection applications under MN DIP in Docket No. E999/M-16-521, the Company proposes to include received complaints and or inquiries from installers. The Company will make that proposal to the DER Advisory Group and propose metrics in a future filing in the E999/M-16-521 docket.

## **V. REQUEST FOR FINDING THAT THESE 129 COMPLAINTS ARE NOT CUSTOMER COMPLAINTS UNDER QSP TARIFF**

### **A. Relevant Provisions of the QSP Tariff**

The Service Quality Plan is included in Section 6 of our tariff, starting at Sheet No.

6-7.1 The definition for the customer complaint metric and threshold can be found at Sheet No. 6-7.7:

*1. Customer Complaints*

*This metric measures the number of Customer Complaints submitted [to] the Commission's Consumer Affairs Office. An under performance payment will be assessed in any year in which the number of complaints exceeds 0.2059 complaints per 1,000 customers.*

*Exclusions*

*Customer complaints will be recorded and reported with no exclusions. The Company may request exclusion of Customer Complaints that the Company can demonstrate are the result of an event beyond the Company's control, which the Company took reasonable steps to address.*

Additionally, the tariff defines "customer" and "customer complaint" at Sheet No. 6-7.2

*6. "Customer"*

*...*

*B. For purposes of Customer Complaints, "Customer" is defined as an electric or a natural gas customer that receives a bill for utility service from the Company or a representative of that customer. A representative includes an individual designated with Power of Attorney for the Customer, an attorney retained to represent the Customer, or an individual authorized by the Customer to act on his/her account.*

*7. "Customer Complaint" is defined as any complaint submitted, in writing, by US Mail, e-mail, or by fax, registered by the Minnesota Public Utilities Commission's Consumer Affairs Office to the Company, regarding a complaint submitted by an Xcel Energy customer in which the customer states a grievance related to the Company's provision of service to that customer.*

*Customer Complaints will be reported in the following categories:*

- Billing & Credit*
- Customer Service*
- Meter Reading*
- Trouble Orders*
- Reliability Duration*
- Reliability Frequency*
- Other*

*This is calculated by dividing the total number of Customer Complaints in the performance year by the product of the total number of Minnesota customers, as reported in the Company’s electric and gas jurisdictional reports, divided by 1,000.*

**B. Finding Request**

The Company requests that the Commission find that the 129 complaints from solar installers related to the MN DIP process and registered with the CAO not be counted for purposes of measuring the QSP tariff complaint metric against the tariff’s threshold. These complaints primarily involved concerns from a single solar installer regarding the Company’s new interconnection process as directed under the MN DIP and the implementation of the process through an updated online tool; which, as explained above, have been actively addressed by the Company.

As noted in Table 3, from January through November 2019, we averaged 23 complaints per month, totaling 255 complaints as of November 30, 2019. The Company’s performance from January 1 to November 30, was well within the threshold of 363 complaints, and suggested a trajectory that would lead us to satisfy the QSP tariff metric. In December, however, we received 141 additional complaints, of which 128 were received from one solar installer. In less than three weeks at the end of December, one solar installer submitted 128 complaints, or 32 percent of the total complaints received in 2019. During this time, even after contacting the installer and proving resolution to specific customer concerns, walking through the new MN DIP process and scheduling weekly calls to review project concerns, the installer continued to submit complaints. In several instances, the installer would contact the Company and then file a PUC complaint before allowing us the opportunity to resolve the situation.

**TABLE 3: 2019 CUSTOMER COMPLAINTS**

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
<b>Monthly</b>	9	12	15	31	37	29	32	21	27	20	22	141
<b>YTD</b>	9	21	36	67	104	133	165	186	213	233	255	396

Historically, we have met the standard under the Customer Complaint metric by simply counting all complaints submitted to the CAO and not parsing whether or not they were genuine “Customer Complaints” as that term is defined in the QSP tariff.<sup>11</sup> In light of the dramatic increase in complaints submitted to the CAO in December

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<sup>11</sup> We acknowledge that it is possible that the manner in which we’ve previously measured for this metric could have led to an overreporting of Customer Complaints.



2019, and because the QSP tariff contemplates a \$1.0 million penalty for underperformance, we believe it is critical to examine the language and intent of the QSP tariff in order to determine the actual number of “Customer Complaints” that should be counted under the metric. Financial penalties should be triggered only if it is due to true underperformance as contemplated by the language of the QSP tariff, thereby reflecting an increase in customer complaints (and a corresponding decline in the Company’s performance), rather than the inclusion of complaint types which are not part of the applicable definitions and were not considered in setting this performance standard.

While the 129 complaints were undoubtedly submitted to the CAO, we do not believe they should be counted towards the Customer Complaint metric in the QSP tariff because of the definition of a Customer and Customer Complaint.<sup>12</sup> The QSP tariff defines “customer” for the purpose of measuring customer complaints as an “electric or natural gas customer that receives a bill for utility service or the customers’ representative.” A representative is defined as “an individual designed with Power of Attorney for the customer, an attorney retained to represent a customer or an individual authorized by the Customer to act on their account.” A “customer complaint” is one where “the customer states a grievance related to the Company’s provision of service to that customer.” It is our understanding that while the installer had been given the authority by the customer to go through the electronic process to help customers join the Solar\*Rewards program, they were not otherwise authorized by the Customer to act on their account. Further, in most situations, the customer did not experience any change in their electric service (or delay in participation in Solar\*Rewards) as a result of the technical glitches of our MN DIP portal, and was therefore not aware of the situation about which the installer was complaining. We do not believe a solar installer should lodge complaints on behalf of our customers

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<sup>12</sup> It is also worth noting that in a 2018 Information Filing, the Company noted a change in how the CAO was handling complaints. In analyzing the 2018 data and investigating the causes, one item we identified was the CAO was no longer referring certain customer calls to the Company for an attempt at resolution prior to recording it as a complaint. At the time, the CAO acknowledged a change in its complaint registration protocol as recording all customer calls as they came in with a confirmation that referring customers to the utilities was no longer part of its protocols. Virtually all customer outreach to the CAO is now considered a complaint. CAO staffers are still able to determine what constitutes an inquiry versus a complaint, but the Company does not have a clear understanding of where the lines are drawn. Following each month end, we have worked with the CAO to reconcile complaints logged by each party for tracking and reporting to the QSP tariff. However, this process needs refinement and consistency. We ask that as part of this process we work together with the CAO to define an inquiry and a complaint so all customer outreach may be treated consistently and establish a formal monthly reconciliation process to track customer inquiries and complaints for QSP tariff reporting.

when the customer has not given that authority, nor are they even aware of the situation.

In addition, we note the current performance threshold of  $\leq 0.2059$  complaints per 1,000 customers was set prior to the expansion of DER installations or the implementation of our new interconnection process as part of our transition to the MN DIP approved by the Commission on August 13, 2018.<sup>13</sup> As part of the interconnection guidelines, the MN DIP contemplates that the CAO will be the venue for dispute resolution.<sup>14</sup> Therefore, the seven-year history (2005 to 2011) of actual customer complaints used to establish the current performance threshold did not contemplate complaints driven by solar installers.

Complaints of this nature regarding solar, or any other type of distributed energy resource installer, was not contemplated to the extent it exists on our system today when the threshold was last updated. Parties previously agreed the metric would count “customer complaints” received by the CAO with the threshold based on seven years of historical data. We recognize the CAO’s position that it must count all complaints received; however, we request Commission’s recognition that customer complaint is a defined term in the QSP tariff and the nature of these and future complaints have changed since the threshold was set. This creates a tension regarding how the Commission wishes to measure performance going forward. We suggest there is a solution in tracking these DER complaints in a separate path and venue through the MN DIP docket.

For all these reasons, the Company does not believe the count of 2019 complaints from the CAO meets the definitions in the tariffs, nor the intent of the QSP to measure performance against a threshold based on historical data. Therefore, we respectfully request the Commission find that 129 complaints should be excluded for the purposes of measuring our 2019 QSP tariff performance. We also suggested that complaints from solar installers can and should be tracked, but not as “customer complaints” for QSP purposes; instead, there should be a separate tracking mechanism for these complaints.

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<sup>13</sup> See Order, *In the Matter of Updating the Generic Standards for the Interconnection and Operation of Distributed Generation Facilities Established Under Minn. Stat. § 216B. 1611*, Docket No. E-999/CI-16-521 (August 13, 2018).

<sup>14</sup> See Xcel Energy Rate Book, Section 10 MINNESOTA DISTRIBUTED ENERGY RESOURCES INTERCONNECTION PROCESS (MN DIP), Sheets 195, 196, and 266.

### **C. Policy Considerations Going Forward**

Reading the QSP tariff in a manner significantly different than the Company proposes above would essentially void the requirement under the Customer Complaint metric to count only “Customer Complaints” and focuses instead solely on the number of complaints “submitted [to] the Commission’s [CAO].” We are concerned that such a change in the application of the Customer Complaint metric would undermine the historical comparative data and purpose behind the metric because it will no longer measure what it was intended for: customer service. We respectfully request that the Commission agree with the Company that the Customer Complaint metric means what the tariff says it means, using all of the defined terms in the QSP tariff until such time when the tariff language is changed.

### **VI. EFFECT OF CHANGE UPON XCEL ENERGY REVENUE**

Approval of our request for finding as proposed in this Petition will not result in any changes to Xcel Energy’s revenue.

### **CONCLUSION**

The Company respectfully requests Commission find that the 129 complaints from solar installers are not “customer complaints” and should not be counted in the Customer Complaints metric in its Quality of Service Plan (QSP) tariff. The Company proposes to include received complaints and or inquiries from installers in the existing docket for compliance of interconnection applications under MN DIP in Docket No. E999/M-16-521. The Company will make that proposal to the DER Advisory Group and propose metrics in a future filing in E999/M-16-521 docket.

Dated: May 1, 2020

Northern States Power Company

STATE OF MINNESOTA  
BEFORE THE  
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
Joseph K. Sullivan	Commissioner
John Tuma	Commissioner

2019 QUALITY OF SERVICE PLAN TARIFF  
ANNUAL REPORT

DOCKET NOS.  
E,G002/CI-02-2034 AND  
E,G002/M-12-383

IN THE MATTER OF NORTHERN STATES  
POWER COMPANY'S REQUEST FOR A  
COMMISSION FINDING REGARDING THE  
CUSTOMER COMPLAINT PERFORMANCE IN  
THE QUALITY OF SERVICE PLAN TARIFF

DOCKET NO. E002/M-20-\_\_\_\_

**ANNUAL REPORT  
AND PETITION**

**SUMMARY OF FILING**

Please take notice that on May 1, 2020, Northern States Power Company, doing business as Xcel Energy, filed with the Minnesota Public Utilities Commission its 2019 Annual Quality of Service Tariff Annual Report. In addition, the Company requests the Commission find that 129 of the complaints submitted to the Commission's Consumer Affairs Office (CAO) should not be counted in the Customer Complaints metric in its Quality of Service Plan (QSP) tariff.

	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19	Standard
<b>1. Customer Complaints to PUC</b>													
Monthly	9	12	15	31	37	29	32	21	27	20	22	141	
YTD	9	21	36	67	104	133	165	186	213	233	255	396	≤ 363

Standard is .2059  
 complaints per 1,000  
 customers

<b>2. Telephone Response Time (Percent answered in ≤ 20 sec)</b>													
Monthly	92.01%	93.07%	93.27%	90.15%	92.64%	90.43%	89.31%	88.77%	85.44%	89.14%	95.08%	93.37%	
YTD	92.01%	92.51%	92.77%	91.96%	92.11%	91.83%	91.40%	91.05%	90.44%	90.31%	90.67%	90.85%	≥ 80%

<b>3. Electric Reliability - SAIDI (Minutes)</b>													
Monthly	4.18	2.78	3.46	6.59	7.20	10.37	14.05	8.50	9.86	4.86	3.12	1.68	
YTD	4.18	6.97	10.43	17.02	24.22	34.59	48.64	57.14	67.00	71.87	74.98	76.66	≤ 133.23 min

<b>4. Electric Reliability - SAIFI (Outage Events)</b>													
Monthly	0.04	0.03	0.04	0.06	0.08	0.09	0.11	0.07	0.08	0.05	0.03	0.02	
YTD	0.04	0.07	0.11	0.17	0.25	0.34	0.45	0.52	0.60	0.64	0.68	0.70	≤ 1.21 outage events

<b>5. Gas Emergency Response Time (Minutes)</b>													
Monthly	75.84	45.78	36.83	37.62	35.11	35.27	34.01	34.86	35.94	33.25	33.36	32.42	
YTD	75.84	59.59	52.77	49.74	47.15	45.70	44.38	43.39	42.66	41.72	40.91	40.11	≤ 60 min

	Number of Eligible Customers	Total Credits
Six or More Service Outages	1,964	\$98,200
Outages Lasting 24-Hours or Longer	306	\$15,300
Consecutive Years of Outages	815	\$71,525
Tracked Small Municipal Pumping Outages (A40)	878	\$87,800
Untracked Small Municipal Pumping Outages (A40)	261	\$40,455
Tracked Large Municipal Pumping Outages (A41)	491	\$98,200
Untracked Large Municipal Pumping Outages (A41)	203	\$78,358
<b>Total</b>	<b>4,918</b>	<b>\$489,838</b>

<b>7. Accurate Invoices (Percent of accurate invoices)</b>													
Monthly	99.86%	99.87%	99.85%	99.87%	99.85%	99.84%	99.86%	99.83%	99.81%	99.82%	99.70%	99.81%	
YTD	99.86%	99.87%	99.86%	99.86%	99.86%	99.86%	99.86%	99.85%	99.85%	99.85%	99.83%	99.83%	> 99.3%

<b>8. Invoice Adjustment Timeliness (Billing Periods)</b>													
Monthly	1.77	1.72	1.55	1.35	1.67	1.60	1.67	1.73	1.55	1.58	1.18	1.48	
YTD	1.77	1.75	1.68	1.60	1.61	1.61	1.62	1.63	1.62	1.62	1.58	1.57	< 2.35 billing periods

**Minnesota Public Utilities Commission  
 Consumer Affairs Office  
 121-7th Place East  
 St. Paul, MN 55101-2147**

**XCEL ENERGY TARIFF SERVICE QUALITY PLAN**

**SUMMARY OF CUSTOMER COMPLAINTS**

For the period of January 01, 2016 to December 31, 2016

Filed in accordance with Docket No. E,G002/CI-02-2034 & E,G002/M-12-383

**Name of Utility:** Northern States Power Company, a Minnesota Corporation

**Address:** 3115 Centre Pointe Drive, Roseville, MN 55113

**Prepared by:** Jeff Eden, Customer Advocate Analyst, Customer Care (303) 294-2214

	1	2	3	4	5	6	7	8	9	10	11	12	Total	Standard
Customer Complaints to PUC														
Billing & Credit	5	5	7	25	25	23	17	15	23	7	17	3	172	
Customer Service	4	2	3	0	5	2	1	1	1	1	0	11	31	
Meter Reading	0	0	0	0	0	0	0	0	0	1	0	0	1	
Reliability-Duration	0	0	0	0	0	0	2	0	0	0	0	0	2	
Reliability-Frequency	0	1	1	1	0	0	2	1	0	1	2	0	9	
Trouble Orders	0	0	0	0	0	1	0	0	0	0	0	0	1	
Other	0	4	4	5	7	3	10	4	3	10	3	127	180	
Monthly	9	12	15	31	37	29	32	21	27	20	22	141	396	
YTD	9	21	36	67	104	133	165	186	213	233	255	396		<363

\*Distributed Generation (DG) are included in the "Other", "Customer Service" and "Billing and Credit" Complaint Types. In 2019 we had approximately 139 complaints from the CAO related to DG.

	All Residential Calls offered to Agents	All BSC Calls Offered to Agents	All Credit Calls Offered to Agents	All PAR Calls Offered to Agents	All Calls Offered to Agents	All Residential Calls Answered by Agents within 20 seconds	All BSC Calls Answered by Agents within 20 seconds	All Credit Calls Answered by Agents within 20 seconds	All PAR Calls Answered by Agents within 20 seconds	All Calls Answered by Agents within 20 seconds	Calls Handled by IVR	All Calls Offered to Agents + Calls Handled by IVR	All Calls Answered by Agents within 20 seconds + Calls Handled by IVR	Service Level
January	68,912	4,806	13,279	2,288	<b>89,285</b>	52,101	3,027	12,191	2,064	<b>69,383</b>	159,860	249,145	229,243	<b>92.01%</b>
February	57,892	4,097	11,841	1,999	<b>75,829</b>	45,733	2,832	10,546	1,702	<b>60,813</b>	140,919	216,748	201,732	<b>93.07%</b>
March	67,056	4,537	16,645	2,946	<b>91,184</b>	53,439	3,174	15,006	2,480	<b>74,099</b>	162,538	253,722	236,637	<b>93.27%</b>
April	86,650	4,696	38,134	6,380	<b>135,860</b>	68,576	3,788	27,048	4,414	<b>103,826</b>	189,399	325,259	293,225	<b>90.15%</b>
May	94,804	5,110	22,374	6,665	<b>128,953</b>	77,191	4,217	19,847	4,727	<b>105,982</b>	182,962	311,915	288,944	<b>92.64%</b>
June	85,787	4,215	13,313	5,026	<b>108,341</b>	63,339	3,407	11,965	3,657	<b>82,368</b>	162,983	271,324	245,351	<b>90.43%</b>
July	109,296	4,950	13,096	5,541	<b>132,883</b>	77,642	3,923	11,353	3,896	<b>96,814</b>	204,430	337,313	301,244	<b>89.31%</b>
August	98,429	5,578	13,870	5,432	<b>123,309</b>	69,836	4,229	12,009	3,873	<b>89,947</b>	173,856	297,165	263,803	<b>88.77%</b>
September	102,238	4,447	15,197	5,452	<b>127,334</b>	67,461	3,449	12,016	3,851	<b>86,777</b>	151,247	278,581	238,024	<b>85.44%</b>
October	94,438	5,212	9,013	3,775	<b>112,438</b>	67,636	3,776	7,702	3,236	<b>82,350</b>	164,586	277,024	246,936	<b>89.14%</b>
November	70,178	4,156	10,655	3,002	<b>87,991</b>	62,679	3,443	7,894	2,540	<b>76,556</b>	144,457	232,448	221,013	<b>95.08%</b>
December	60,406	4,171	8,057	2,770	<b>75,404</b>	48,673	3,537	6,763	2,360	<b>61,333</b>	136,684	212,088	198,017	<b>93.37%</b>
<b>2019</b>	<b>996,086</b>	<b>55,975</b>	<b>185,474</b>	<b>51,276</b>	<b>1,288,811</b>	<b>754,306</b>	<b>42,802</b>	<b>154,340</b>	<b>38,800</b>	<b>990,248</b>	<b>1,973,921</b>	<b>3,262,732</b>	<b>2,964,169</b>	<b>90.85%</b>

Notes:

The renegotiated metrics approved by the Commission in the 2013 Order revised the telephone response time metric to include all calls to our Call Centers or business office, whether they are handled via Interactive Voice Response (IVR) or by call center representatives.

**2019 Xcel Energy Minnesota Tariff Reliability Indices**

**IEEE Normalized**

**All Causes, No Transmission Line Level**

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Deviation			2018 YE	2017 YE	2016 YE	2015 YE	2014 YE
													2019 YE Actual	2019 YE Target	From Target					
<b>Minnesota</b>																				
SAIDI	4.18	2.78	3.46	6.59	7.20	10.37	14.05	8.50	9.86	4.86	3.12	1.68	76.66	133.23	-56.57	93.26	73.80	89.49	86.83	79.85
SAIFI	0.04	0.03	0.04	0.06	0.08	0.09	0.11	0.07	0.08	0.05	0.03	0.02	0.70	1.21	-0.51	0.85	0.72	0.81	0.79	0.78
CAIDI	105.28	95.25	81.66	104.90	91.98	113.12	133.48	123.52	124.46	102.37	93.21	83.35	109.74	NA	NA	109.90	102.10	110.54	109.90	102.07
Cust Mins	5,320,667	3,538,312	4,408,150	8,391,609	9,170,369	13,201,447	17,893,470	10,875,215	12,633,002	6,237,966	4,001,992	2,165,201	97,837,400							
Cust Ints	50,539	37,148	53,983	79,999	99,701	116,699	134,052	88,047	101,505	60,937	42,934	25,976	891,520							
Cust Serv	1,271,572	1,272,182	1,273,191	1,273,389	1,273,236	1,272,910	1,273,366	1,280,040	1,280,959	1,282,278	1,284,381	1,287,572								
<b>Metro East</b>																				
SAIDI	4.17	1.30	3.65	6.89	10.89	10.45	17.72	9.92	6.68	3.63	2.32	1.65	79.26	NA	NA	103.28	75.70	95.49	93.71	77.58
SAIFI	0.04	0.02	0.05	0.06	0.11	0.10	0.12	0.08	0.05	0.04	0.03	0.02	0.72	NA	NA	0.92	0.75	0.87	0.90	0.82
CAIDI	96.88	75.82	68.93	111.19	99.38	106.97	144.19	121.85	131.13	95.10	83.49	108.68	110.29	NA	NA	112.40	100.79	110.07	104.58	94.81
Cust Mins	1,749,596	544,565	1,533,456	2,893,871	4,573,809	4,389,109	7,443,720	4,182,587	2,820,396	1,531,694	982,083	701,525	33,346,410							
Cust Ints	18,059	7,182	22,248	26,026	46,023	41,032	51,624	34,326	21,508	16,106	11,763	6,455	302,352							
Cust Serv	419,683	419,901	420,157	420,211	420,088	419,961	420,135	421,742	421,918	422,298	423,044	424,150								
<b>Metro West</b>																				
SAIDI	3.82	2.54	2.83	4.06	5.17	9.83	13.41	5.41	12.48	5.27	2.16	1.27	68.25	NA	NA	81.25	69.28	82.90	88.98	81.85
SAIFI	0.04	0.03	0.04	0.06	0.07	0.09	0.11	0.05	0.10	0.05	0.03	0.02	0.69	NA	NA	0.84	0.70	0.82	0.82	0.82
CAIDI	89.89	80.13	76.07	73.20	75.67	106.20	127.07	99.19	123.84	98.87	82.71	62.93	99.17	NA	NA	96.63	98.40	101.51	108.90	100.15
Cust Mins	2,300,981	1,533,072	1,708,114	2,452,465	3,122,470	5,930,999	8,096,207	3,289,433	7,598,397	3,213,150	1,318,919	775,324	41,339,529							
Cust Ints	25,599	19,133	22,455	33,505	41,265	55,846	63,714	33,162	61,357	32,500	15,946	12,320	416,802							
Cust Serv	602,621	602,845	603,436	603,556	603,725	603,657	603,795	608,316	608,874	609,255	610,028	611,784								
<b>Northwest</b>																				
SAIDI	3.83	4.27	4.13	3.04	4.92	7.16	8.39	5.33	7.49	5.04	5.13	2.44	61.17	NA	NA	99.87	69.41	80.19	69.39	62.16
SAIFI	0.02	0.04	0.03	0.05	0.05	0.05	0.06	0.05	0.07	0.03	0.06	0.03	0.53	NA	NA	0.73	0.64	0.56	0.57	0.61
CAIDI	186.99	110.70	149.26	60.76	109.12	155.25	144.03	117.43	111.17	152.53	78.92	79.87	115.94	NA	NA	137.06	107.70	143.58	121.05	102.05
Cust Mins	461,670	515,420	498,979	367,853	593,824	864,743	1,014,271	645,375	907,158	612,244	624,191	297,340	7,403,067							
Cust Ints	2,469	4,656	3,343	6,054	5,442	5,570	7,042	5,496	8,160	4,014	7,909	3,723	63,878							
Cust Serv	120,666	120,755	120,871	120,858	120,786	120,697	120,884	121,043	121,183	121,384	121,716	121,815								
<b>Southeast</b>																				
SAIDI	6.29	7.35	5.19	20.79	6.84	15.68	10.42	21.39	10.13	6.81	8.31	3.01	122.21	NA	NA	110.67	92.84	109.59	70.78	94.45
SAIFI	0.03	0.05	0.05	0.11	0.05	0.11	0.09	0.12	0.08	0.06	0.06	0.03	0.84	NA	NA	0.77	0.79	0.82	0.52	0.67
CAIDI	183.23	153.03	112.45	185.75	126.28	141.51	114.74	183.09	124.72	105.91	147.18	112.42	145.17	NA	NA	144.04	117.19	133.06	135.23	141.93
Cust Mins	808,419	945,255	667,601	2,677,421	880,266	2,016,596	1,339,273	2,757,821	1,307,052	880,878	1,076,799	391,012	15,748,393							
Cust Ints	4,412	6,177	5,937	14,414	6,971	14,251	11,672	15,063	10,480	8,317	7,316	3,478	108,488							
Cust Serv	128,602	128,681	128,727	128,764	128,637	128,595	128,552	128,939	128,984	129,341	129,593	129,823								

Note: IEEE 1366 normalization method applied after removing Transmission Line level events

Note: All causes are included

Note: Meter based customer counts

Note: Interruptions and customer counts associated with customers in the work region of North Dakota that are in Minnesota are included in the Northwest work region

Note: Interruptions and customer counts associated with customers in the work region of South Dakota that are in Minnesota are included in the Southeast work region



## ***Major Event Days***

*Major Event Days (MEDs) are determined using the Tariff method which is based on applying IEEE 1366 normalization after removing Transmission Line level outages. Customer counts are Meter based.*

### **Metro East**

7/15, 9/2

### **Metro West**

7/14, 7/15

### **Northwest**

***(Includes ND region customers/outages in MN)***

4/7, 4/11, 9/2, 9/17,

### **Southeast**

***(Includes SD region customers/outages in MN)***

4/10, 4/11, 7/20, 9/24

**Year: 2019**

Job Code	Job Description	Call Count	Answer & Talk Time	Avg Answer & Talk Time	Dispatch Time (Enroute Time)	Avg Dispatch Time (Enroute Time)	Travel Time	Avg Travel Time	Total Response Time	Avg Response Time	# Orders Responded to in <= 60 Minutes	% of Orders Responded to in <= 60 Minutes	# Orders Responded to in > 60 Minutes	% of Orders Responded to in > 60 Minutes
EBG	Broken/Hit Gas Line	448	1619.56	<b>3.62</b>	3,436.88	7.67	7,738.51	17.27	12,794.88	28.56	429	96%	19	4%
ECO	CO Check/Alarm	1,456	5383.74	<b>3.70</b>	29,745.60	20.43	25,626.99	17.60	60,755.97	41.73	1,355	93%	101	7%
EEX	Gas Explosion	6	22.72	<b>3.79</b>	33.90	5.65	114.60	19.10	171.22	28.54	6	100%	0	0%
EFI	Gas Fire	214	800.77	<b>3.74</b>	1,772.39	8.28	3,391.15	15.85	5,964.39	27.87	211	99%	3	1%
EIR	Ice Regulator	147	566.73	<b>3.86</b>	6,357.83	43.25	2,834.87	19.28	9,759.48	66.39	124	84%	23	16%
EOI	Smells Gas Inside	7,041	26039.56	<b>3.70</b>	116,144.45	16.50	130,080.58	18.47	272,261.39	38.67	6,573	93%	468	7%
EOO	Smells Gas Outside	4,144	15375.84	<b>3.71</b>	75,734.82	18.28	79,406.10	19.16	170,517.31	41.15	3,773	91%	371	9%
EPR	High / Low Pressure	561	2092.46	<b>3.73</b>	8,812.50	15.71	10,969.64	19.55	21,874.51	38.99	504	90%	57	10%
ETX	CO Emergency	255	937.26	<b>3.68</b>	3,611.26	14.16	4,909.97	19.25	9,458.46	37.09	239	94%	16	6%
NOGAS	Customer Reports No Gas	966	3534.94	<b>3.66</b>	23,429.29	24.25	18,383.42	19.03	45,347.90	46.94	871	90%	95	10%
<b>All Gas Emergency Calls for Year 2019</b>		<b>15,238</b>	<b>56373.58</b>	<b>3.70</b>	<b>269,078.92</b>	<b>17.66</b>	<b>283,455.82</b>	<b>18.60</b>	<b>611,196.18</b>	<b>40.11</b>	<b>14,085</b>	<b>92%</b>	<b>1,153</b>	<b>8%</b>

The accurate invoice metric measures the percent of accurate invoices the Company issues to its customers. This is calculated by determining the number of invoices canceled for controllable reasons divided by the total number of invoices issued. The Company defines controllable reasons as: (1) human errors made by field or office personnel, (2) billing system and metering system communications errors and (3) malfunctioning meter equipment.

<b>MN Only</b>	<b>Jan-19</b>	<b>Feb-19</b>	<b>Mar-19</b>	<b>Apr-19</b>	<b>May-19</b>	<b>Jun-19</b>	<b>Jul-19</b>	<b>Aug-19</b>	<b>Sep-19</b>	<b>Oct-19</b>	<b>Nov-19</b>	<b>Dec-19</b>	<b>Annual Average</b>
Actual Number of Invoices Canceled for Controllable Reasons	2,477	2,076	2,745	2,289	2,839	2,741	2,528	2,863	2,798	3,473	5,146	3,383	<b>2,947</b>
Total Number of Invoices	2,088,055	1,852,434	1,787,771	2,117,470	2,116,403	1,962,584	2,125,295	2,133,811	1,879,492	2,296,856	1,868,797	1,964,784	<b>2,016,146</b>
Controllable % Error Free Invoices	99.86%	99.87%	99.85%	99.87%	99.85%	99.84%	99.86%	99.83%	99.81%	99.82%	99.70%	99.81%	<b>99.83%</b>

The invoice adjustment timeliness metric measures the average number of canceled billing periods on invoices rebilled for controllable reasons. This is calculated by determining the number of elapsed days between the original invoice issue date and the issue date of the rebilled invoice. To determine the number of billing periods on the rebilled invoice, the total elapsed days is divided by 30.5, which is the average number of days in a billing period. The Company defines controllable reasons as (1) human errors made by field or office personnel, (2) billing system and metering system communications errors and (3) malfunctioning meter equipment.

<b>MN Only</b>	<b>Jan-19</b>	<b>Feb-19</b>	<b>Mar-19</b>	<b>Apr-19</b>	<b>May-19</b>	<b>Jun-19</b>	<b>Jul-19</b>	<b>Aug-19</b>	<b>Sep-19</b>	<b>Oct-19</b>	<b>Nov-19</b>	<b>Dec-19</b>	<b>Annual Average</b>
Total Number of Controllable Cancel Rebills	2,477	2,076	2,745	2,289	2,839	2,741	2,528	2,863	2,798	3,473	5,146	3,383	<b>2,947</b>
Total Number of Months On Rebill	2,174	1,834	2,328	1,958	2,606	2,350	2,388	2,904	1,737	2,985	4,624	2,526	<b>2,535</b>
Billing Periods on Rebilled Invoices (Controllable Adjustment Timeliness)	1.77	1.72	1.55	1.35	1.67	1.60	1.67	1.73	1.55	1.58	1.18	1.48	<b>1.57</b>

**CERTIFICATE OF SERVICE**

I, Paget Pengelly, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States mail at Minneapolis, Minnesota

xx electronic filing

**DOCKET Nos. E,G002/CI-02-2034  
E,G002/M-12-383  
ELECTRIC / GAS MISC SVC**

Dated this 1<sup>st</sup> day of May 2020

/s/

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Paget Pengelly

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022191	Electronic Service	No	OFF_SL_2-2034_1
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400  St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_2-2034_1
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280  Saint Paul, MN 551012198	Electronic Service	Yes	OFF_SL_2-2034_1
Susan	Medhaug	Susan.medhaug@state.mn.us	Department of Commerce	Suite 280, 85 Seventh Place East  St. Paul, MN 551012198	Electronic Service	No	OFF_SL_2-2034_1
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_2-2034_1
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350  Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_2-2034_1
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	200 S 6th St Ste 470  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_2-2034_1
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7  Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_2-2034_1
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400  St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_12-383_Official
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280  Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_12-383_Official
Craig	Johnson	cjohnson@lmc.org	League of Minnesota Cities	145 University Ave. W.  Saint Paul, MN 55103-2044	Electronic Service	No	OFF_SL_12-383_Official
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Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_12-383_Official
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750  St. Paul, MN 55101	Electronic Service	No	OFF_SL_12-383_Official
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350  Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_12-383_Official
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	200 S 6th St Ste 470  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_12-383_Official
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7  Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_12-383_Official

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Thomas	Tynes	jjazynka@energyfreedomcoalition.com	Energy Freedom Coalition of America	101 Constitution Ave NW Ste 525 East Washington, DC 20001	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric and Gas
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Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine	225 South Sixth Street, Suite 3500 Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric and Gas
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