

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

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

Chair
Commissioner
Commissioner
Commissioner
Commissioner

In the Matter of Xcel Energy’s Annual Report on Safety, Reliability, and Service Quality for 2019; and Petition for Approval of Electric Reliability Standards for 2020

ISSUE DATE: December 18, 2020

DOCKET NO. E-002/M-20-406

DOCKET NO. E-017/M-20-401

In the Matter of Otter Tail Power Company’s 2019 Annual Safety, Reliability and Service Quality Report and Proposed SAIFI, SAIDI, and CAIDI Reliability Standards for 2020

DOCKET NO. E-015/M-20-404

ORDER ACCEPTING REPORTS,
REQUIRING ADDITIONAL FILINGS,
AND ESTABLISHING WORKSHOP

In the Matter of Minnesota Power’s 2020 Safety, Reliability, and Service Quality Standards Report

PROCEDURAL HISTORY

On April 1, 2020, Otter Tail Power Company (Otter Tail) and Minnesota Power filed their 2019 Annual Safety, Reliability, and Service Quality reports, and on April 2, 2020, Xcel Energy (Xcel) filed its 2019 Annual Safety, Reliability, and Service Quality report.

On August 12, 2020, the Department of Commerce, Division of Energy Resources (the Department) filed comments on Minnesota Power’s and Otter Tail’s reports; on August 19, 2020, the Department filed comments on Xcel’s report.

On August 19, 2020, the City of Minneapolis and the Suburban Rate Authority filed comments on Xcel’s filing. Also on this date, the Environmental Law and Policy Center and Vote Solar filed comments on the utilities’ filings.

On August 26, 2020, Minnesota Power and Otter Tail filed reply comments, and on September 2, 2020, Xcel filed reply comments.

On September 2, 2020, the Department filed reply comments on Xcel’s report, as did both Fresh Energy and the Suburban Rate Authority.

On October 6, 2020, the Department filed comments in response to Xcel’s reply comments.

On November 5, 2020, the reports came before the Commission.

FINDINGS AND CONCLUSIONS

I. Background

On or before April 1 of each year, each public utility providing retail electric service in Minnesota must file a report on its safety, reliability, and service-quality performance during the last calendar year.¹ Utilities must also propose reliability performance standards for the current year.² The Commission annually sets reliability standards for each utility.³

The reports include information on customer average interruption duration (CAIDI); system average interruption duration index (SAIDI); and system average interruption frequency index (SAIFI). The utilities use the Institute of Electrical and Electronics Engineers (IEEE) 2.5 beta method, also called the IEEE 1366 standard, for normalizing major event days.

II. The 2019 Reports

The Department analyzed each utility's report and recommended that the Commission accept them, stating that each utility had met all applicable reporting requirements.

In evaluating the reports, the Department made a number of recommendations, including that the Commission consider establishing a technical conference to resolve certain issues, particularly related to locational reliability and equity.

The Department further recommended that the Commission set service quality standards for 2020 at various levels for each utility. For Minnesota Power, the Department recommended leaving the standards at 2016 levels for 2020 instead of using the IEEE benchmarking option.⁴ The Department recommended leaving Otter Tail's standards at 2013 levels until performance improves, and recommended that Xcel's standard be left at 2019 levels (for the Metro East SAIDI and CAIDI metrics and the Northwest SAIDI and CAIDI metrics) or that in the alternative, the Commission require Xcel to report in its next service filing on improvements made to its system, particularly to the Metro East and Northwest work centers.

The Department recommended against transitioning to benchmarking to measure reliability, stating that it would be more reasonable to supplement the utilities' annual reports with benchmarking analyses for comparative purposes. The Department explained that the current approach of measuring performance using a five-year rolling performance average offers an important and first-hand company-specific perspective. Relinquishing this approach, the Department maintained, would stifle analysis by removing important data on utility-specific efforts. Rather, the Department recommended tempering the transition away from the rolling five-year average with use of IEEE benchmarking as a comparative analysis.

¹ Minn. R. 7826.0400; .0500, subp. 1.; and .1300.

² Minn. R. 7826.0600, subp. 1.

³ *Id.*, subp. 2.

⁴ The benchmarking option requires the utilities to benchmark their performance to the IEEE reliability standards.

The utilities supported use of IEEE benchmarking to set 2020 standards. Xcel specifically recommended setting the 2020 standards using a five-year average of second quartile results from the IEEE Distribution Working Group survey for the large utility group.

III. Commission Action

The Commission hereby accepts the utilities’ reports for 2019 and will take the following actions set forth below.

A. 2020 Standards

Although the Department recommended against use of IEEE benchmarking, the Commission is persuaded that it is reasonable to further explore its usefulness. The Commission will therefore require utilities to report reliability based on the traditional five-year rolling average at the work-center level but will require utilities to use IEEE benchmarking to measure system-wide performance. This approach will help form a clearer understanding of the potential advantages of IEEE benchmarking for measuring service quality performance. As such, the Commission will set performance levels as described below.

The Commission will set Minnesota Power’s 2020 Minnesota service territory-wide reliability standard at the IEEE benchmarking second quartile for medium utilities. Minnesota Power must file a supplemental filing to the Company’s 2020 report 30 days after IEEE publishes the 2020 benchmarking results, with an explanation for any missed standards.

The Commission will set Minnesota Power’s service center reliability standards for 2020 at the levels described below.

	SAIDI	SAIFI	CAIDI
2016 Standard	98.19	1.02	96.26

The Commission will set Otter Tail Power’s 2020 Minnesota service territory-wide reliability standard at the IEEE benchmarking second quartile for medium-sized utilities. Otter Tail must file a supplemental filing to its 2020 report 30 days after IEEE publishes the 2020 benchmarking results, with an explanation for any missed statewide standards.

The Commission will set Otter Tail Power’s work center reliability standards for 2020 at the following levels.

Work Center	SAIDI	SAIFI	CAIDI
Bemidji	70.64	1.26	56.06
Crookston	69.33	1.19	58.26
Fergus Falls	55.97	1.11	60.33
Milbank	75.49	1.82	41.48
Morris	55.78	1.01	55.23
Wahpeton	57.24	1.13	50.65

The Commission will set Xcel Energy’s 2020 Minnesota service territory-wide reliability standard at the IEEE benchmarking second quartile for large utilities. Xcel must file a supplemental filing to its 2020 report 30 days after IEEE publishes the 2020 benchmarking results, with an explanation for any missed statewide standards.

The Commission will set Xcel’s work center reliability standards for 2020 at the following levels.

Work Center	SAIDI	SAIFI	CAIDI
Metro East	89.95	0.84	106.91
Metro West	79.37	0.79	100.55
Northwest	87.11	0.75	115.72
Southwest	94.82	0.76	122.04

The Commission will require Xcel to clarify call center data in its 2020 reports and discuss the Company’s efforts to improve the reliability of its Customer Resource System, including why interactive voice response is included in reporting for calls answered within 20-second threshold.

B. Reporting Requirements

The Commission will require the utilities to make future filings, as directed below.

The Commission will require the utilities to file, within 30 days, the following data.

- Xcel Energy must file the causes of sustained 2019 customer outages, by service center, in the form of a spreadsheet.
- Minnesota Power must file:
 - Interruptions to the bulk power system for 2019
 - Causes of sustained outages, by service center for 2019, as a spreadsheet
 - The highest number of interruptions experienced by any one customer (or feeder, if customer level is not available)
 - The longest experienced interruption by any one customer (or feeder, if customer level is not available)

The Commission will also require Xcel to continue filing quarterly status reports on efforts to improve reliability in the Southeast Work Center through fourth quarter 2021.

The Commission will require the utilities to file the reliability (SAIDI, SAIFI, CAIDI, and Momentary Average Interruption Frequency Index, or MAIFI, normalized/non-normalized) for feeders with grid modernization investments such as Advanced Metering Infrastructure or Fault Location Isolation and Service Restoration to the historic five-year average reliability for the same feeders before grid modernization investments.

With the 2020 reports due April 2021, the utilities must discuss and propose a transition to a full benchmarking approach to setting reliability standards. In advance of the transition, the

Commission will delegate authority to the Executive Secretary to continue conversations with utilities and other interested parties on the following topics:

- Definition of “work centers”
- Benchmarking for individual work centers
- Other considerations for the transition to benchmarking

The Commission will direct utilities to report over the next two reporting cycles, to the extent feasible, the following:

- Yearly total number of website visits;
- Yearly total number of logins via electronic customer communication platforms;
- Yearly total number of emails or other customer service electronic communications received; and
- 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.

If a utility is unable to report this information, the utility must explain why it is unable to do so and detail plans for reporting the information in the future.

The Commission will require each utility to file a compliance filing within 30 days of the date of the that explains the utility’s engagement plans related to Emergency Medical Account status. Further, OTP and Xcel must also file a detailed description of the resolution to the reporting problems attributed to their updated Customer Information System/SAP work management systems that affect their Service Extension request response times.

After consultation with Department and Commission staff, the utilities must file revised categories for reporting complaint data. The Commission will delegate authority to the Executive Secretary to approve additional reporting categories, with the goal of establishing them by the April 1, 2021 report filing.

The Commission will delegate to the Executive Secretary the authority to approve each utility’s public facing summaries and to work with the utilities to refine language and content in the summaries as needed.

Finally, the Suburban Rate Authority; the City of Minneapolis; Fresh Energy; and Environmental Law and Policy Center and Vote Solar supported proposals for obtaining data from Xcel to inform issues related to locational reliability and equity. They supported requiring Xcel to report granular data on various outage metrics by neighborhood or at the feeder level. Xcel expressed support for filing data at the zip code level to avoid inadvertent disclosure of data that could be used to identify customers. The Company also offered to provide maps as part of its annual service quality filing to illustrate overlapping data points, such as outage data and median income levels, related to locational reliability and equity.

To address these issues, the Commission will require Xcel to file the information listed in Attachment A in its Safety, Service Quality, and Reliability report due April 1, 2021.

Further, the Executive Secretary is directed to convene one or more technical workshops, with stakeholders suggested by parties, to further develop the record and to issue notices as appropriate. Xcel must work with the workgroup to develop an interactive map, with input from stakeholders on the scope and details of the map and must file an update on the development of the map by October 1, 2021.

C. Rule Variance

Under Minn. R. 7829.3200, the Commission must vary its rule upon making the following findings:

- enforcement of the rule would impose an excessive burden upon the applicant or others affected by the rule;
- granting the variance would not adversely affect the public interest; and
- granting the variance would not conflict with standards imposed by law.

Xcel requested, and the Department concurred, that the Commission grant a variance to Minn. R. 7826.0500, subp. 1, item G, to relieve the utilities from filing, as part of their annual service quality reports, a separate report of extensive length that they separately file with the Commission's Consumer Affairs Office.

The Commission concurs that the requirements for a variance are met in this case, finding that enforcement of the rule would impose an excessive burden on the applicant or others affected by the rule; granting the variance would not adversely affect the public interest; and granting the variance would not conflict with standards imposed by law. The Commission will therefore grant the variance but require the utilities to file related data in the form similar to the data filed by Xcel in attachment G of its initial filing.

ORDER

1. The Commission hereby accepts Xcel's, Otter Tail's, and Minnesota Power's annual Safety, Service Quality, and Reliability reports for 2019.
2. Within 30 days, the following utilities must file a compliance filing with the following data:
 - a. Xcel Energy: causes of sustained customer outages, by service center for 2019, as a spreadsheet
 - b. Minnesota Power:
 - i. Interruptions to the bulk power system for 2019
 - ii. Causes of sustained outages, by service center for 2019, as a spreadsheet
 - iii. The highest number of interruptions experienced by any one customer (or feeder, if customer level is no available)

- iv. The longest experienced interruption by any one customer (or feeder, if customer level is not available)
3. Xcel Energy must continue filing quarterly status reports on efforts to improve reliability in the Southeast Work Center through fourth quarter 2021.
 4. The Commission hereby grants a variance to Minn. R. 7826.0500, subp. 1, item G, applicable to Minnesota Power, Otter Tail, and Xcel. The utilities must file a summary table that includes the information contained in the reports, similar to Attachment G of Xcel’s filing.
 5. The utilities must file the reliability (SAIDI, SAIFI, CAIDI, MAIFI, normalized/non-normalized) for feeders with grid modernization investments such as Advanced Metering Infrastructure or Fault Location Isolation and Service Restoration to the historic five-year average reliability for the same feeders before grid modernization investments.
 6. With the 2020 service quality reports due April 2021, the utilities must discuss and propose a transition to a full benchmarking approach to setting reliability standards. In advance of the transition, the Commission hereby delegates authority to the Executive Secretary to continue conversations with utilities and other interested parties on the following topics:
 - a. Definition of “work centers”
 - b. Benchmarking for individual work centers
 - c. Other considerations for the transition to benchmarking
 7. The Commission hereby sets Minnesota Power’s 2020 Minnesota service territory-wide Reliability Standard at the IEEE benchmarking second quartile for medium utilities. The Company must file a supplemental filing to its 2020 service quality report 30 days after IEEE publishes the 2020 benchmarking results, with an explanation for any standards the utilities did not meet.
 8. Minnesota Power’s service center Reliability Standards for 2020 are set at the levels described below.

	SAIDI	SAIFI	CAIDI
2016 Standard	98.19	1.02	96.26

9. The Commission hereby sets Otter Tail Power’s 2020 Minnesota service territory-wide Reliability Standard at the IEEE benchmarking second quartile for medium utilities. The Company must file a supplemental filing to its 2020 service quality report 30 days after IEEE publishes the 2020 benchmarking results, with an explanation for any statewide standards the utility did not meet.

10. The Commission hereby sets Otter Tail Power’s work center Reliability Standards for 2020 at the following levels.

Work Center	SAIDI	SAIFI	CAIDI
Bemidji	70.64	1.26	56.06
Crookston	69.33	1.19	58.26
Fergus Falls	55.97	1.11	60.33
Milbank	75.49	1.82	41.48
Morris	55.78	1.01	55.23
Wahpeton	57.24	1.13	50.65

11. The Commission hereby sets Xcel Energy’s 2020 Minnesota service territory-wide Reliability Standard at the IEEE benchmarking second quartile for large utilities. Xcel must file a supplemental filing to its 2020 service quality report 30 days after IEEE publishes the 2020 benchmarking results, with an explanation for any statewide standards the utility did not meet.

12. The Commission hereby sets Xcel’s work center Reliability Standards for 2020 at the following levels.

Work Center	SAIDI	SAIFI	CAIDI
Metro East	89.95	0.84	106.91
Metro West	79.37	0.79	100.55
Northwest	87.11	0.75	115.72
Southwest	94.82	0.76	122.04

13. Xcel Energy must clarify call center data in its 2020 service quality reports, discuss the Company’s efforts to improve the reliability of its Customer Resource System, and explain why interactive voice response is included in reporting for calls answered within 20-second threshold.

14. Each utility must report over the next two reporting cycles, to the extent feasible, the following:

- 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.

If a utility is unable to report the information, the utility must provide an explanation as to why the information is not filed and the plans for reporting the information in the future.

15. Within 30 days, each utility must file a compliance filing in which engagement plans related to Emergency Medical Account status are explained. Otter Tail and Xcel must also include a detailed description of the resolution to the reporting problems attributed to their updated Customer Information System/SAP work management system as it pertains to their Service Extension request response times.
16. 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.
17. The Commission hereby delegates to the Executive Secretary the authority to approve Xcel's, Minnesota Power's, and Otter Tail's public-facing summaries. The Executive Secretary may work with the utilities to refine the language and content in the summaries as needed.
18. Xcel must file the information listed in the revised Attachment A with its Safety, Service Quality, and Reliability report due April 1, 2021.
19. Xcel must work with the workgroup to develop an interactive map, with input from stakeholders on the scope and details of the map. Xcel must file an update on the development of the map by October 1, 2021.
20. This order shall become effective immediately.

BY ORDER OF THE COMMISSION



Will Seuffert
Executive Secretary



This document can be made available in alternative formats (e.g., large print or audio) by calling 651.296.0406 (voice). Persons with hearing or speech impairment may call using their preferred Telecommunications Relay Service or email consumer.puc@state.mn.us for assistance.

Attachment A: Locational/Equity Reliability Data

Xcel shall provide the following information, as a downloadable .csv or .xlsx file, by feeder, for the calendar year. Xcel may exclude feeders that meet the 15/15 aggregation standard.

- a. Reliability reporting region where the feeder is located
- b. The substation the feeder is on, with its full name
- c. The zip code in which the feeder is primarily located
- d. The number of customers on the feeder, including the proportion of residential to commercial and industrial
- e. Whether the feeder is overhead or underground
- f. SAIDI, SAIFI, and CAIDI, normalized (IEEE 1366 Standard) and with Major Event Days
- g. Number of outages, total customer outages, and total customer-minutes-out for the following situations:
 - i. All levels, All Causes included
 - ii. Bulk Power supply - All causes, distribution, substation, transmission substation, and transmission line levels
 - iii. All levels, no "planned" cause, includes bulk power supply
 - iv. All levels, "planned" cause only, includes bulk power supply
- h. Number of outages, total customer outages, and total customer-minutes-out in the following primary outage cause categories, normalized and non-normalized
 - i. Equipment - OH
 - ii. Equipment - UG
 - iii. Lightning
 - iv. Other
 - v. Power Supply
 - vi. Planned
 - vii. Public
 - viii. Unknown
 - ix. Vegetation
 - x. Weather - Non-Lightning
 - xi. Wildlife

CERTIFICATE OF SERVICE

I, Leesa Norton, hereby certify that I have this day, served a true and correct copy of the following document to all persons at the addresses indicated below or on the attached list by electronic filing, electronic mail, courier, interoffice mail or by depositing the same enveloped with postage paid in the United States mail at St. Paul, Minnesota.

**Minnesota Public Utilities Commission
Order Accepting Reports, Requiring Additional Filings, and Establishing
Workshop**

Docket Number **E-017/M-20-401; E-015/M-20-404; and E-002/M-20-406**

Dated this 18th day of December, 2020

/s/ Leesa Norton

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Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	OFF_SL_20-401_20-401
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_20-401_20-401
Brooke	Cooper	bcooper@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_20-401_20-401
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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_20-401_20-401
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Nikhil	Vijaykar	NVijaykar@elpc.org	Enviornental Law & Policy Center	N/A	Electronic Service	No	OFF_SL_20-401_20-401

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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_20-404_20-404
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_20-404_20-404
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_20-404_20-404
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John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd. St. Louis, MO 63119-2044	Electronic Service	No	OFF_SL_20-406_20-406
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_20-406_20-406
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John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance	2720 E. 22nd St Institute for Local Self-Reliance Minneapolis, MN 55406	Electronic Service	No	OFF_SL_20-406_20-406
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Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_20-406_20-406
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Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_20-406_20-406
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