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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 Originally Established in Docket No. E, G-02/CI-02-2034 & Investigation and Audit of Service Quality Reporting-Fraud wise Report

MINNESOTA SOLAR ENERGY INDUSTRIES ASSOCIATION'S (MnSEIA) LETTER

January 15, 2021

Docket No. CI-02-2034/M-12-383

MnSEIA Letter

At the outset, we acknowledge that this letter is being filed outside of a comment period and may or may not be considered by the Commission. In our initial comments we mentioned that we would continue to track our member complaints.¹ This letter highlights the informal member complaints that we have received since the comment period closed. In short, we have been made aware of **180 additional instances** where our members believe that Xcel Energy (Xcel or the Company) has fallen short of reasonable expectations for quality of service.

The vast majority of these potential complaints are timeline problems, where, as one member put it, "Xcel has not been able to meet the original deadline and have granted themselves an extension." When pressed, our installers have estimated that Xcel misses timelines for between 25%-45% of projects.

¹ See MINNESOTA SOLAR ENERGY INDUSTRIES ASSOCIATION'S (MnSEIA) COMMENTS, 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 Originally Established in Docket No. E, G-02/CI-02-2034 & Investigation and Audit of Service Quality Reporting-Fraud wise Report, Docket No. CI-02-2034/M-12-383, Doc. Id. 20207-164547-01 (July 1, 2020) at 10.

Based on feedback from MnSEIA members, the interconnection portal, which was a subject of Xcel's initial filing,² seems to have—on the whole—considerably improved over the last year. Nonetheless, improvement has been spotty. One MnSEIA member has told us that, “during the past week only **one of the 8** interconnection application plan sets [...] uploaded and advanced in the portal as it is supposedly designed to.” (Emphasis added.) Others have described the fits and starts of Xcel's progress on its interconnection portal as a game of “whack-a-mole” where new problems arise as soon as old problems are mitigated.

That said, the overall improvement shows in the data. Whereas 85% of the complaints giving rise to this matter were characterized by the Company as “portal issues,”³ the proportion of the 180 potential complaints shared with MnSEIA staff is considerably lower than what the Company and CAO experienced at the end of 2019. About two dozen of those might be characterized as portal issues. We would like to note further that Xcel has solicited suggestions for portal improvement from MnSEIA members and relevant working groups, and we believe that that input has been integral to the improvements we've seen. We should stress, however, that further improvements remain necessary with some of our members suggesting to us that a total rebuild may be required.

Errors in meter ordering continue to be a problem, according to what MnSEIA members have reported. At least two members have reported Company errors in ordering meters, which have been compounded in some instances by a very long response time to the issue.

Lastly, a commonality among nearly all of the potential complaints we have received after the comment period closed has been the long response times from Xcel staff. These delayed responses have compounded issues where a document was not uploaded properly in the portal, or when engineering timelines have been delayed. That said, our members consistently praise the quality of work that individual Xcel program administrators do—but stress that in their estimation the Company itself has underinvested in staff and software.

On the whole, the feedback we have received from member companies have demonstrated that Xcel's quality of service for its interconnection customers has slightly improved since the initial complaints were filed at the end of 2019, but problems still remain. Interconnection timelines continue to hamper all industry sectors operating in Xcel territory, and remain out of step with timelines in other utility territories. The Company's consistent tardiness in reaching MN DIP milestones reinforces the need for Xcel to make dramatic investments in staff and software if it is to deliver a quality of service consistent with its tariff and the expectations of Minnesotans wishing to go solar.

² See Northern States Power Company d/b/a Xcel Energy, COMPLIANCE FILING--ANNUAL REPORT AND REQUEST OR COMMISSION FINDINGS REGARDING THE CUSTOMER COMPLAINT PERFORMANCE SERVICE QUALITY PLAN, 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 Originally Established in Docket No. E, G-02/CI-02-2034 & Investigation and Audit of Service Quality Reporting-Fraud wise Report, Docket No. CI-02-2034/M-12-383, Doc. Id., 20205-162847-01 (May 4, 2020), at 11.

³ *Ibid.*

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