

**STATE OF MINNESOTA
BEFORE THE PUBLIC UTILITIES COMMISSION**

Katie Sieben	Chair
Joseph Sullivan	Vice-Chair
Hwikwon Ham	Commissioner
Audrey Partridge	Commissioner
John Tuma	Commissioner

In the Matter of Northern States Power
Company d/b/a Xcel Energy's Electric 2024
Annual Safety, Reliability, and Service Quality
Report

Docket No. E-002/M-25-27

**Supplemental Comments of the Citizens Utility Board of Minnesota
and the Legal Services Advocacy Project**

The Citizens Utility Board of Minnesota ("CUB") and Legal Services Advocacy Project ("LSAP") respectfully submit these Supplemental Comments in response to the Minnesota Public Utilities Commission's ("Commission") Notice of Extended Supplemental Comment Period issued on August 14, 2025, in the above-referenced docket. Specifically, we offer comments regarding complaints submitted by the Building Owners and Managers Association ("BOMA") in its July 11, 2025 Initial Comment, and on BOMA's request for an investigation into Xcel Energy's ("Xcel's" or "the Company's") billing system and customer service operations. In its Initial Comments, BOMA details a number of "issues [that] stem from Xcel's billing system and its customer service team."¹ In response to what it deems an "astounding volume of issues," BOMA "requests the Commission initiate an investigation into the systemic issues plaguing Xcel Energy's billing system and customer service operations."²

CUB and LSAP have similar concerns about Xcel's customer service and billing systems. To the extent possible, we strive to address customer matters collaboratively with the Company prior to raising them with the Commission. We are grateful for Xcel's willingness to hear these issues and its attempts to resolve them, and we hope to continue these conversations as new issues arise. Nonetheless, our team has fielded complaints and questions from Xcel's residential customers that cause us to share BOMA's concern that certain issues may be indicative of more systemic problems within the Company. We therefore offer several stories shared with us by Xcel customers, which we believe are relevant to the Commission's consideration of BOMA's request for an investigation in this proceeding. We have

¹ *In the Matter of Northern States Power Company d/b/a Xcel Energy's 2024 Annual Safety, Reliability, and Service Quality Report*, Docket No. E-002/M-25-27, Initial Comments of the Building Owners and Managers Association of Greater Minneapolis at 1 (Jul. 11, 2025) (hereinafter "BOMA Initial Comments").

² *Id.* at 4, 5 (While BOMA further requests that the Commission "closely scrutinize and reduce Xcel Energy's requested rate increase . . . as it relates to customer service and the utility's billing systems," it is CUB's understanding that this request will be evaluated in Docket No. E-002/GR-24-320 as part of the Company's rate case proceeding).

provided as much detail as possible while preserving the anonymity of any customer who has not given us explicit permission to share their experience.

I. Concerns from Minnesota Customers

A. Past-due customers and payment agreements

The Commission has affirmed, and Xcel has acknowledged, that “Minn. Stat. § 216B.096, subds. 5(a), 5(c), and 10(1), as well as Minn. Stat. § 216B.098 require the utility to negotiate payment agreement terms . . . individually with each customer based on the customer’s financial circumstances and any extenuating circumstances of the household.”³ However, customers have reported to CUB that Xcel agents are sometimes unwilling to offer payment agreement terms that are affordable for the household and/or that properly consider extenuating circumstances. We are aware of at least one case resulting in a disconnection that caused a significant issue for a medically affected household.

We understand from conversations with Xcel that customers requesting a payment agreement that varies from the standard structure⁴ are referred to the Personal Accounts Representative (“PAR”) team, which has authorization to offer alternative payment arrangement terms. While CUB typically advises any individuals with payment plan concerns to contact the Commission’s Consumer Affairs Office for assistance, customers that CUB has worked with have sometimes been able to reach agreeable payment arrangements after themselves escalating their concerns to higher-level agents. However, customers have informed us that Xcel’s call center agents did not offer the option to speak with a PAR team representative. Without CUB’s advice, some customers may not have known to escalate their concerns. Further, some have told us that they have had to make multiple requests for higher-level agents, and speak to multiple Xcel representatives, before being able to negotiate an affordable payment plan.

Additionally, we believe that Xcel is not consistently referring qualified individuals to available assistance resources. Customers who contact Xcel regarding past-due bills between October and May should be informed about Low-Income Home Energy Assistance (“LIHEAP” or “Energy Assistance”) and how to apply. A customer who has received a primary heat grant from Energy Assistance qualifies for an additional crisis grant when they face service disconnection; crisis grants are typically available through June. Customers who have already received Energy Assistance are also likely to qualify for the Company’s affordability programs, such as PowerOn, which are available year-round. However, multiple Xcel customers who have contacted CUB have told us that they were not referred to such resources before or as part of negotiating arrangements for the payment of arrears.

³ *In the Matter of Xcel Energy's 2023 Annual Safety, Reliability, and Service Quality Report*, Docket No. E002/M-24-27, Order Accepting Reports and Setting Additional Requirements at 6 (Jan. 13, 2025); Xcel Corrected Compliance Filing, Att. A at 2 (Mar. 3, 2025).

⁴ *In the Matter of Xcel Energy's 2023 Annual Safety, Reliability, and Service Quality Report*, Docket No. E002/M-24-27, Xcel Corrected Compliance Filing, Att. A at 2 (Mar. 3, 2025) (showing the graduated down payment structure used by the Company in negotiating payment plans).

B. Errors or missing information in customers' online portals

a. Incorrect information regarding TOU rate

Between November 2020 and October 2022, Xcel piloted a time of use ("TOU") rate for residential customers that included the following schedule:⁵

- Weekdays:
 - On-peak: 3pm-8pm
 - Off-peak: midnight-6am
 - Mid-peak: all other hours (6am-3pm, 8pm-midnight)
- Weekends and Holidays:
 - No on-peak
 - Off-peak: midnight-6am
 - Mid-peak: 6am-midnight

After the pilot period ended, participating households continued to be enrolled in the rate unless they chose to opt out.⁶

In July 2025, a Minneapolis resident who was enrolled in this rate contacted CUB. The customer had moved into their home in August 2023. They later learned that the home had already been enrolled in Xcel's TOU pilot, but they reported receiving no direct communications or details from the Company about the rate. Instead, they consulted Xcel's online customer portal ("My Account") for information about the rate being charged to them.

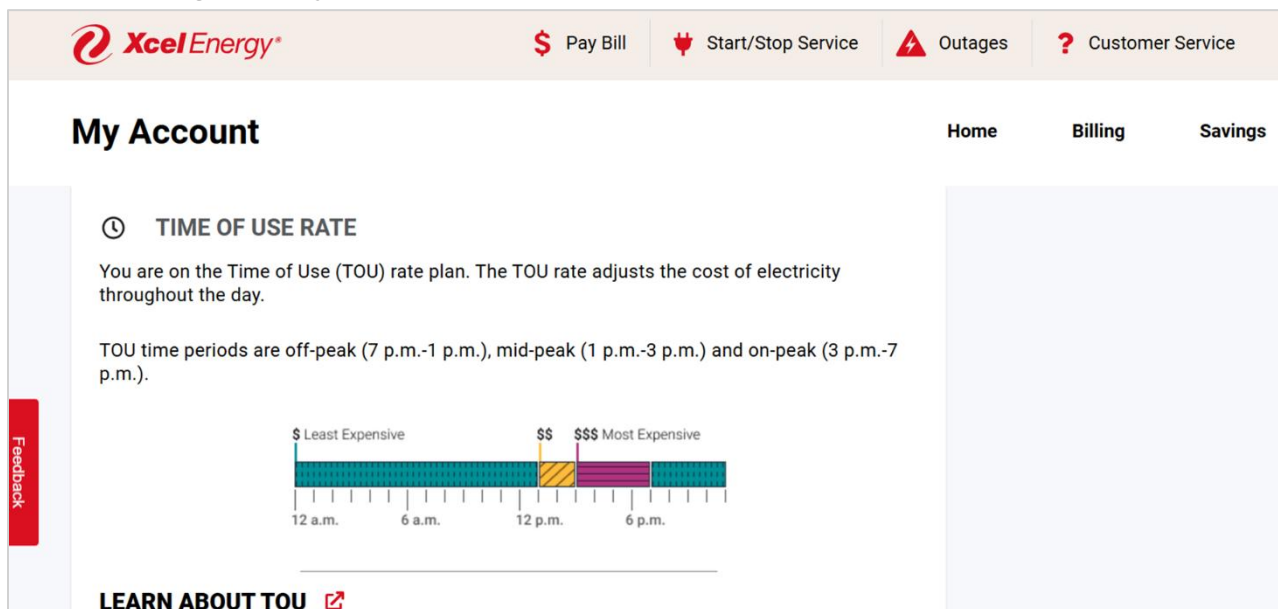
Unfortunately, the customer's My Account portal reflected an incorrect TOU rate schedule. Below are screenshots from the customer's My Account, which they captured and shared with CUB in July 2025.⁷

⁵ *In the Matter of the Petition of Northern States Power Company for Approval of a Time of Use Rate Design Pilot Program*, Docket No. E002/M-17-775, Xcel Compliance Filing – Pilot Completion, Att. A at 11 (Feb. 10, 2023).

⁶ *Id.* at 5-6; Northern States Power Minnesota Electric Rate Book, Section 5, Sheets 4.1-4.3, available at <https://xcelnew.my.salesforce.com/sfc/p/#1U0000011ttV/a/R3000009eD7q/dG8j89hN0jiO6SAKQKFHcNhiXf0Osoz7XMTYXy0qV2o>.

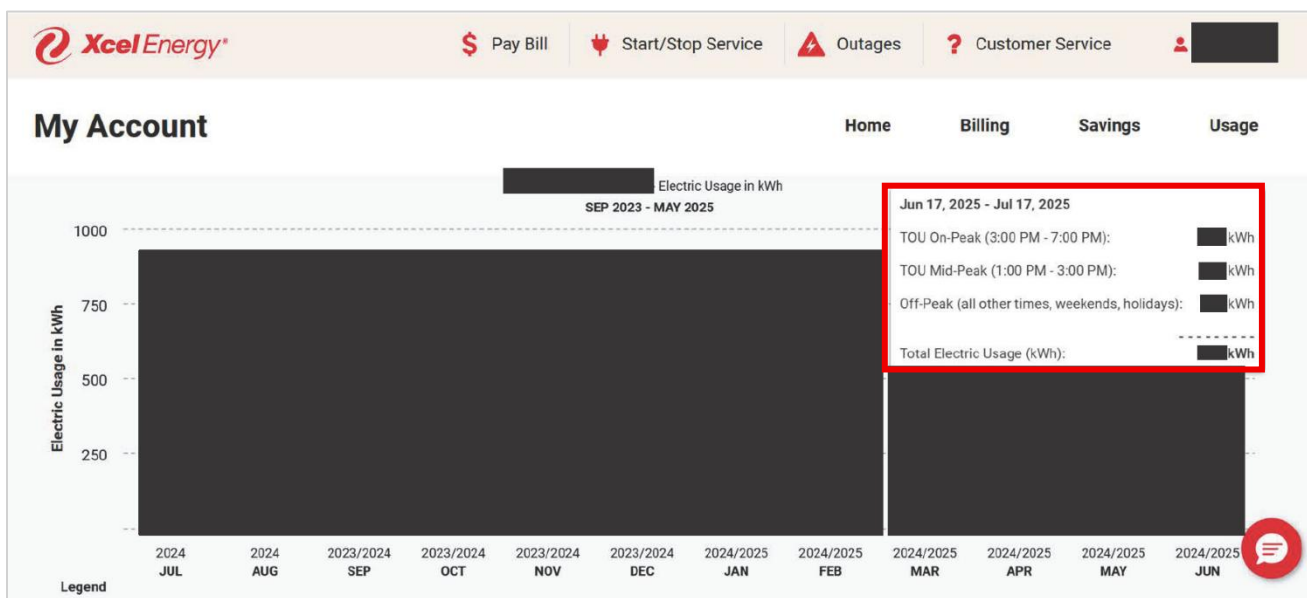
⁷ Identifying information has been redacted.

Figure 1: My Account Presentation of Incorrect Time-of-Use Rate Periods



In addition to showing the incorrect rate on the TOU landing page, the customer's My Account portal appeared to separate usage data based on these alternative time periods.

Figure 2: My Account Energy Usage Information



Adding to the customer's confusion, the hourly view of billing in the customer's My Account portal generally aligned with the Minnesota TOU rate schedule. However, it showed the customer being billed on-peak rates on holidays, including Memorial Day and the Fourth of July of this year.

Through our conversations with the customer—and after examining billing data they provided—CUB confirmed they were being charged appropriately according to the Minnesota TOU rate schedule.

However, the schedule reflected in the customer's My Account portal corresponded with the TOU rate offered in the Company's Colorado service territory, which rolled out in early 2022.⁸ The customer reported having relied on this incorrect information to adjust their energy usage.

The customer further indicated they called Xcel in the spring of 2024 after realizing they were on the TOU rate. The customer asked to be transitioned to the Company's standard rate but recalled Xcel saying they would be charged a \$25 fee to do so. For this reason, the customer opted to remain on the TOU rate. CUB is unaware of such a fee being approved by the Commission; it is our understanding that customers are permitted to opt out of the pilot rate for no charge.

CUB has met with Xcel to discuss this matter, and we greatly appreciate the Company's attention and transparency when communicating with us about it. We understand that any pilot program is likely to be imperfect, and we expect and look forward to improved communication with the rollout of the Company's new TOU rate next year. That said, we remain concerned that harm may have been done to the customer who identified this discrepancy, as they report having adjusted their energy usage according to an incorrect schedule provided by the Company. We suspect that other customers may have been similarly affected, as this individual told us that a neighbor saw the same incorrect TOU information in their My Account portal. Further, if this miscommunication was widespread—and depending on when it was first presented to customers—it may have affected the second-year results of the Company's TOU pilot.

To the extent customers experienced financial harm as a consequence of these discrepancies, we believe that the Company should provide a remedy. We do not make a specific recommendation at this time, but the Commission may wish to investigate this issue further.

b. Usage information unavailable online

In some cases, customers' energy usage data is unavailable to them. A customer contacted CUB after their July 2025 electricity bill reflected usage well in excess of 1,000 kWh, an 80 percent increase compared with July 2024. They reported that their August 2025 bill was similarly high. In an attempt to better understand the cause of this bill increase, CUB's staff asked the customer about their energy usage. While the customer reported having an AMI meter installed more than two years earlier, their usage data was unavailable in Xcel's online portal. The customer shared the screenshots below.

⁸ *In the Matter of the Advice letter No. 1814 Filed by Public Service Company of Colorado to Implement the Modified Residential Energy Time-of-Use Schedule to Become Effective January 2, 2020*, Proceeding No. 19AL-0687E, Decision No. R20-0642 at 51 (Sep. 11, 2020) (noting that the TOU transition began on April 1, 2022).

Figure 3: Missing Usage and Cost Data

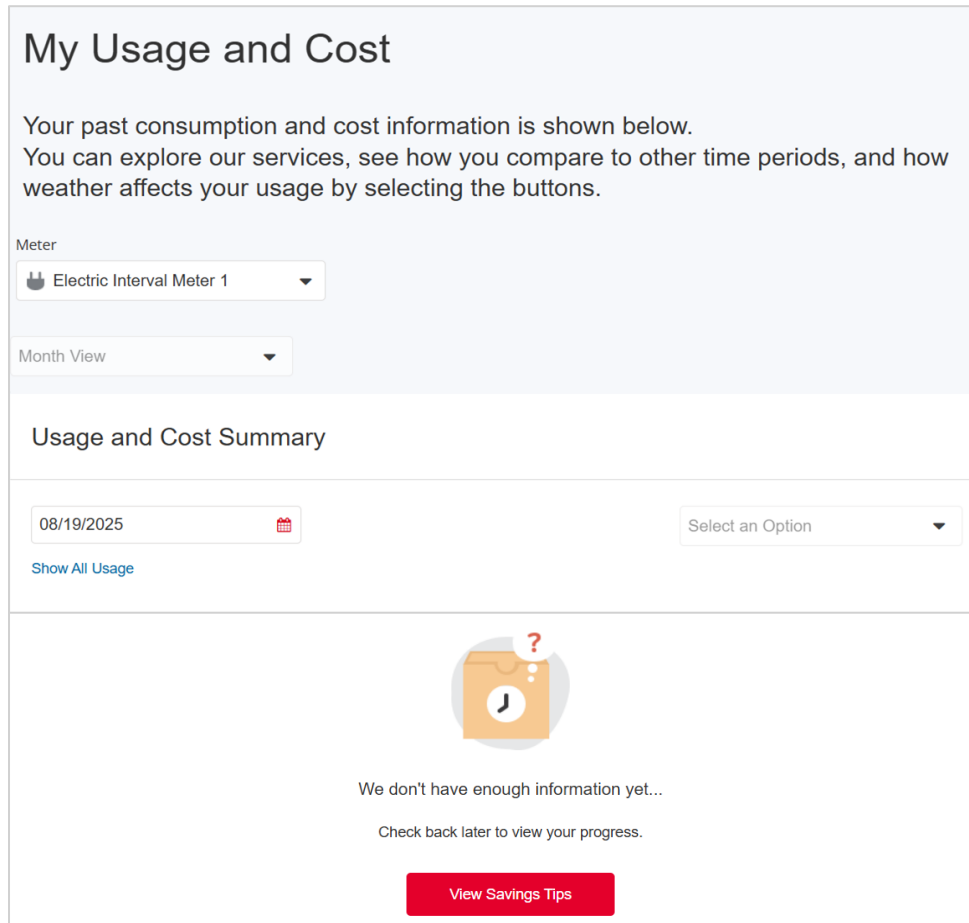
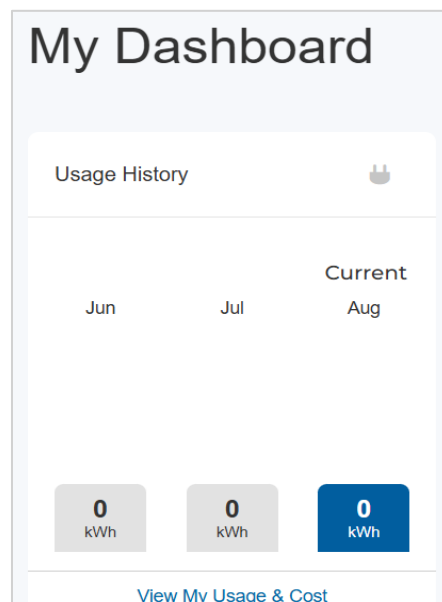


Figure 4: My Account Dashboard with Missing Usage Data



As of mid-September, the customer reported they had spoken with a representative from Xcel. The representative confirmed that the customer's meter was working properly but was similarly unable to see the customer's up-to-date energy usage. To CUB's knowledge as of the time of writing, Xcel has been unable to resolve this issue. If indeed the meter reading is accurate, the customer's unusually high energy use could be due to a malfunctioning appliance within their home. The unavailability of AMI data makes this more difficult to investigate and prevents the customer from realizing a primary benefit of their new meter: providing detailed usage information to customers.⁹

C. Poor information about rate and program options

We have received complaints that Xcel's customer service agents are unprepared to discuss rate and program options. For example, in August 2025, a customer reached out to CUB reporting that they had recently installed an air source heat pump and called Xcel to enroll in the electric space heating rate. They had seen an update from CUB that the rate was recently reduced to 6.537 cents per kWh ("¢/kWh").¹⁰ However, the Xcel agent they spoke with maintained the new rate would be 8.2 ¢/kWh. The customer told CUB that they challenged the agent, after which the agent spoke with a specialist and reaffirmed the rate would be 8.2 ¢/kWh going forward.

After receiving this inquiry, CUB confirmed the Commission required Xcel to set its one-period electric space heating rate at 6.537 ¢/kWh within 30 days of its order dated May 15, 2025, making the new rate effective October 1, 2025, at the start of the heating season.¹¹ We further found that although Xcel's Electric Space Heating webpage¹² listed this new rate, the Residential Rate Plan webpage¹³ still listed the rate at 8.2 ¢/kWh. When CUB contacted Xcel, the Company confirmed the 6.537 ¢/kWh rate would be charged to electric space heating customers once the heating season started in October 2025. Xcel thereafter clarified its response to the customer and corrected its webpage. Xcel also offered to ensure call center agents have updated information going forward.

We appreciate Xcel's quick response to this customer's concern. However, this individual's experience is consistent with other reports we have received about customer care agents not referring eligible customers to the electric space heating rate, being uninformed about the sales tax exemption for electric heat,¹⁴ and having difficulty providing information about different rate options.

⁹ *In the Matter of Northern States Power Company d/b/a Xcel Energy's Petition for Approval of the Transmission Cost Recovery Rider Revenue Requirements for 2021-2022, and the Resulting Adjustment Factors by Customer Class*, Docket No. E-002/M-21-814, TCR Supplement Filing at 21-22 (Aug. 17, 2022) (stating that AMI will "provide more detailed energy usage information than was previously available to customers" and enable "guidance regarding behaviors that [will allow customers to] save on their monthly bills").

¹⁰ Olivia Carroll, *Sign-up for Xcel's New Electric Space Heating Rate to See Savings on Your Winter Energy Bills*, CUB (Jun. 4, 2025).

¹¹ *In the Matter of the Petition of Xcel Energy for Approval of a Residential Time of Use Rate Design*, Docket No. E-002/M-23-524, Order Approving Revised Opt-in Proposal and Setting Reporting Requirements at 7 (May 15, 2025).

¹² Xcel Energy, *Electric Space Heating*, <https://mn.my.xcelenergy.com/s/residential/heating-cooling/heating-upgrade-rebates>.

¹³ Xcel Energy, *Regular Residential Rate Plan*, <https://mn.my.xcelenergy.com/s/billing-payment/residential-rates/residential-plan>.

¹⁴ See Minn. Stat. § 297A.67, subd. 15(3) (providing that households using electricity for primary heating are exempt from sales tax for electric service during the months of November through April).

II. Indications of Broader Billing and Customer Service Problems

Beyond the experiences reported by individual customers, data indicate that the Company is experiencing significant and systemic issues related to billing and customer service. On September 10, 2025, the Commission's Consumer Affairs Subcommittee announced its intent to initiate an investigation into what it described as an "alarming" and "significant increase in billing errors" affecting Xcel's residential customers. The Commission's Order states that the number of Xcel billing complaints rose more than five-fold in two years, from 204 in 2022 to 1,191 in 2024.¹⁵

Xcel acknowledges that customer satisfaction has declined. Within the Company, the measurement and billing of energy use, payment processing, and customer questions and concerns are handled by the Customer Care organization.¹⁶ According to Xcel, its Voice of the Customer ("VOC") Transaction Survey is the most direct measure of customers' satisfaction with these services.¹⁷ Measured by this survey, customers' overall satisfaction with a Customer Care transaction declined from 82 percent in 2021 to 71 percent in January-August 2024.¹⁸ Satisfaction with the Company's Interactive Voice Response ("IVR") similarly declined from 82 percent in 2021 to 68 percent in January-August 2024.¹⁹

The Company attributes this trend to the longer call center response time—which has been extensively discussed by CUB and other parties in Xcel's Quality of Service Plan docket—"combined with the need to address large, extended storm outages."²⁰ While we have not reviewed individual survey results, we believe customer satisfaction could also be affected by the Company's billing errors, sharply increasing service disconnections,²¹ and the unsatisfactory experiences of customers, such as those described above.

III. Conclusion

CUB and LSAP appreciate the opportunity to share our concerns related to billing and customer service. We hope that the Commission will find this informative as they consider BOMA's request for an investigation. We reiterate our appreciation for Xcel's willingness to address the complaints of individual customers as we raise them. That said, we share BOMA's suspicion that the reports we are

¹⁵ *In the Matter of an Investigation into Xcel Energy's Residential Billing Errors*, Docket No. E,G-002/CI-25-341, Order Initiating Investigation at 2 (Sep. 10, 2025).

¹⁶ *In the Matter of the Application of Northern States Power Company for Authority to Increase Rates for Electric Service in Minnesota*, Docket No. E-002/GR-24-320, Direct Testimony and Schedules of Nora C. Lindgren at 4 (Nov. 1, 2024) (hereinafter "Lindgren Direct").

¹⁷ *Id.* at 12.

¹⁸ *Id.*

¹⁹ *Id.*

²⁰ *Id.*; see also *In the Matter of an Investigation and Audit of Service Quality Reporting – Fraudwise Report*, Docket No. E,G-002/CI-02-2034, Reply Comments of the Citizens Utility Board of Minnesota (Aug. 15, 2025).

²¹ See, e.g., *In the Matter of the Application of Northern States Power Company for Authority to Increase Rates for Electric Service in Minnesota*, Docket No. E-002/GR-24-320, Direct Testimony of Annie Levenson-Falk at 10 (Aug. 22, 2025) (stating that "Xcel involuntarily terminated service to more households in 2024 than in any other year in recent history. The comparison is not even close. . . . In 2023, the Company carried out more disconnections (24,722) than in any year since 2016. . . . In 2024, the Company disconnected more than twice as many residential customers (52,549) than during the previous year. . . . Xcel is on track to surpass those numbers in 2025. . . . Since 2015, the six months in which Xcel reported the highest number of shutoffs are May, June and July 2025 and May, July, and August 2024").

receiving may be indicative of more systemic issues within the Company. We believe that the Commission's recently initiated investigation into Xcel's residential billing errors is a good start. However, based on our conversations with Xcel customers, and bolstered by BOMA's filing and the data cited above, we believe that a broader investigation into the Company's customer service is warranted.

Sincerely,

September 22, 2025

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