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April 16, 2020

—VIA EMAIL & U.S. MAIL—

Mr. Steven M. Kahl, Executive Secretary
North Dakota Public Service Commission
State Capitol Building, Dept. 408
600 East Boulevard
Bismarck, ND 58505-0480

RE: REQUEST FOR APPROVAL TO TEMPORARILY WAIVE RULES REGARDING
ESTIMATED METER READS FOR MANUALLY READ ACCOUNTS DUE TO THE
COVID-19 PANDEMIC (CASE NO. PU-20-___)

Dear Mr. Kahl:

Northern States Power Company, a Minnesota corporation (Xcel Energy) respectfully requests the Commission to temporarily waive certain administrative rules during the COVID-19 pandemic relating to the estimation of electric and natural gas energy usage. The request pertains to the relatively few residential customers with meters requiring manual reads and is intended to reduce personal interactions between these customers and our meter reading employees during this unusual time.

North Dakota Administrative Code Chapter 69-09-02-10(2) states that a “utility may read meters used for determining charges to customers less frequently than once each month provided authorization thereof is obtained from the commission.” Chapter 69-09-02-11(3) allows use of estimated consumption if a utility is unable to obtain a meter reading. Xcel Energy requests that Chapter 69-09-02-10(2) be temporarily waived because certain manually read meters will be read less frequently than once each month. A temporary waiver of Chapter 69-09-02-11(3) is also reasonable. The rule allows estimating when a Company is *unable* to obtain a meter reading. However, in this case the Company is physically able to obtain these meter readings but has determined it is not in the public interest to do so during the COVID-19 pandemic.

Xcel Energy has developed a plan to temporarily halt the manual reading of the 58 residential electric accounts and 716 natural gas accounts that can't be remotely and automatically read each month. The plan, which went into effect on Tuesday, April 14, will:

- Suspend manual reading of residential meters,

- Continue manual reading of commercial meters where doing so involves little to no customer contact,
- Provide personal protective equipment (gloves, masks) to all meter readers.

In addition, we will be notifying the affected customers of the estimated reads with the following messaging on their bills:

This bill reflects an estimate. Due to COVID-19, we're helping ensure the safety of our employees and customers by temporarily suspending manual meter reading. When we begin manual reading of meters again, your bill will reflect the actual energy you have used.

Our call center employees are aware of this change and are prepared to address customer questions or concerns regarding the suspension of residential customer manual meter reading.

Given the evolving nature of the COVID-19 pandemic, we are not proposing a firm end date for the requested waiver and the resumption of full manual meter reading activity. Xcel Energy will continue to monitor and re-evaluate the need for the above safety actions in the coming weeks.

An electronic copy of this filing is being sent to ndpsc@nd.gov. An original and seven copies are being sent by U.S. mail. If you have any questions regarding this filing, please contact me. Thank you.

Sincerely,

A handwritten signature in blue ink that reads "David H. Sederquist". The signature is written in a cursive style.

DAVID H. SEDERQUIST
SR. CONSULTANT, REGULATION & FINANCE

cc: Stacy Eberle