



2302 Great Northern Drive
Fargo, ND 58102

May 3, 2024

—Via Electronic Mail and U.S. Mail—

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

RE: APPLICATION
AMI SELF-READING TARIFF MODIFICATIONS
CASE NO. PU-24-____

Dear Mr. Kahl:

Northern States Power Company, doing business as Xcel Energy, submits the enclosed original and seven copies of the application to the North Dakota Public Service Commission for approval of changes to its tariffs contained in our Electric Rate Book, as related to the Company's obligations for allowing customers to self-read their meters.

An electronic copy of this filing is also being sent to you for your convenience. Please contact me at alex.j.nisbet@xcelenergy.com if you have any questions regarding this filing.

Sincerely,

/s/

ALEX NISBET
REGULATORY POLICY SPECIALIST

Enclosures
cc: Victor Schock

STATE OF NORTH DAKOTA
BEFORE THE
NORTH DAKOTA PUBLIC SERVICE COMMISSION

IN THE MATTER OF THE APPLICATION OF
NORTHERN STATES POWER COMPANY
FOR APPROVAL OF ADVANCED
METERING INFRASTRUCTURE METER-
RELATED TARIFF CHANGES

CASE NO. PU-24-____

APPLICATION

I. INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits to the North Dakota Public Service Commission this Application requesting modifications to North Dakota Electric Rate Book Section 6, Sheets 16 and 17. This request will align with how Advanced Metering Infrastructure (AMI) meters are read in comparison to legacy meters, as the tariffs we seek to modify specifically address the Company's obligations related to allowing customers to self-read their meters.

The new AMI meters that we are in the process of deploying (rollout expected to be complete by the end of 2025) do not permit customers to self-read. This is because of the way the new AMI meters collect, store, and display usage data. For this reason, we are seeking modifications to the related Tariffs.

We respectfully request the Commission approve the following:

- A modification to North Dakota Electric Tariff Section 6, Sheet 16.
- A modification to North Dakota Electric Tariff Section 6, Sheet 17.

II. FILING INFORMATION

Pursuant to Section 69-02-02-04 of the North Dakota Administrative Code, the following information is provided:

A. Contact information for utility making the filing

Lauren Steinhäuser
Assistant General Counsel
Xcel Energy Services Inc.
401 Nicollet Mall – 401, 8th Floor
Minneapolis, MN 55401

Alex Nisbet
Regulatory Policy Specialist
Xcel Energy
2302 Great Northern Drive
PO Box 2747

(612) 216-8274

Lauren.steinhaeuser@xcelenergy.com

Fargo, ND 58108-2747

alex.j.nisbet@xcelenergy.com

We request that all communications regarding this proceeding, including data requests, also be directed to:

Christine Schwartz
Regulatory Administrator
Xcel Energy
414 Nicollet Mall – 401, 7th Floor
Minneapolis, MN 55401
regulatory.records@xcelenergy.com

B. Date of filing and proposed effective date

The date of this filing is May 3, 2024. The Company proposes that the requested tariff modifications would go into effect immediately upon Commission approval. Customers would be able to self-read their meter until they receive their new AMI meter.

C. Statutory Authority

We submit this application pursuant to N.D.C.C. Section 49-05-05 which allows a utility to make changes to its tariffs upon 30 days' notice to the Commission.

D. Articles of Incorporation

Pursuant to Section 69-02-02-04 of the North Dakota Administrative Code, a certified copy of Xcel Energy's Articles of Incorporation is on file with the Commission, as is an original Certificate of Good Standing.

III. BACKGROUND

The Company is in the process of replacing our legacy Automated Meter Reading (AMR) meters with AMI meters, and we expect to complete the rollout by the end of 2025. AMI meters register and display energy consumption differently than legacy AMR meters. The AMR meters counted and recorded consumption from the installation date of the meter, and usage for billing purposes was calculated by subtracting the previous meter "register" reading from the current register reading. This is a common historical energy billing practice for utilities to bill customers on kilowatt-hour (kWh) consumption only (non-demand) type rates. It relies on

rudimentary meter functionality that registers and accumulates usage of each kilowatt hour (kWh) used over time. Readings for these types of meters generally occur once each month, and result in customers being billed for the cumulative number of kWh used over the course of that billing period. This cumulative usage value was viewable to customers on the face of the meter. This means that customers with AMR meters were able to self-read their usage, if desired, by simply reporting the latest reading to the utility, and we were able to use the cumulative kWh consumption they reported for that billing period to determine the bill.

In contrast to the legacy AMR meters, the AMI meters the Company is deploying, record usage differently and as a result, facilitate enhanced information for customers, and advanced rate and billing options. We explained this change in the billing basis in our Petition seeking variances to the billing content rules in Case No. PU-22-180. For example, advanced meters do not record total consumption over time, they record electricity consumption for defined time periods, typically in 5-, 15-, 30-, or 60-minute increments, known as intervals. These intervals are transmitted to the Company's billing systems over the Field Area Network (FAN) that is being deployed concurrent with the AMI meters, which sums the intervals for the billing period and calculates customers' bills. In anticipation of the rollout of AMI, we modified our billing system to rely on interval information for all customer billing, as first described in our Petition seeking variances to the billing content rules in Case No. PU-22-180. Interval billing provides customers with significantly more granular information about how they use electricity and ultimately facilitates broad advanced rate offerings.

As soon as a customer receives their AMI meter, the basis of their bill transitions to energy usage "intervals" recorded by the AMI meters. This means that, as soon as their new meter is installed, our bills to customers with AMI meters are no longer based on the subtractive register method used for AMR meters, and, for two reasons, customers who have received their AMI meter can no longer self-read. First, and most importantly, only the latest interval is displayed on the face of the AMI meter and visible to the customer. As a result, there is no way for an individual customer to view and report their energy consumption for an entire billing period without Company assistance, and self-reading of AMI meters is therefore not possible. Second, even if the meter still displayed the "register" read, it could not be used for billing because it would not match their billing basis.

With legacy AMR meters, it was very uncommon for a customer to request to self-read their meter—only two unique customers out of our approximately 90,000 North Dakota electric customers provided self-reads in 2023. Therefore, these changes will have little impact on our customers. There may still be occasional, limited duration incidents where the Company is unable to obtain a read from an AMI meter. In these

cases, there will be no option for customers to self-read, and a Company technician will need to access the meter to gather the customer’s usage information using specialized equipment.

Finally, we note that whether a customer has chosen to opt-out of the AMI meter does not affect their ability to self-read—it is still not possible. These opt-out customers are still receiving a new meter which collects and stores usage intervals to be used for billing. Therefore, it does not allow them to self-read. Instead, their meter will need to be read monthly by a Company technician with specialized meter-reading equipment – thus the monthly charge for manual reading of the non-standard opt-out meters. In addition to North Dakota Rule,¹ our tariff allows us access to the property for the purpose of reading the meter.² Additionally, one of the conditions of choosing to opt-out of an AMI meter is that the customer agrees to let a technician onto their property to read the meter. If the customer does not agree to allow a utility technician on their property to read their meter, they cannot opt-out of the AMI meter.

There is no statutory requirement or state rule that requires the Company to provide customers with a self-read option.³ As a result, the Company believes that we do not need to request a permanent variance and have not included a request for variance with this filing. The Company simply seeks to modify its tariffs to accurately align with the meter reading capabilities of AMI meters.

IV. TARIFF MODIFICATIONS

The Company proposes to revise language related to customer self-reading of meters in North Dakota Electric Rate Book Section 6, Sheets 16 and 17, to align with the changing technology and for clarity. The Company sets forth the modifications for our Tariff below (red underline for additions, strikethroughs for removals):

3.3 MONTHLY BILLING

Bills will normally be rendered monthly and may be paid by mail, or electronic or phone options, or to it's the Company's duly authorized agents during regular business hours. A “month”, as used for billing purposes, does not mean a calendar month, but means the interval between two consecutive periodic meter reading dates which are, as nearly as practicable, at 30 day intervals. The Company may read certain meters less frequently than once each billing month ~~for customers under the Company's self meter reading procedure, or when the Company and customers otherwise mutually agree~~, except that ~~a the~~ the Company ~~representative~~ will read the meter at least once ~~each~~ every three (3)

¹ North Dakota Rule 69-09-02-05.1.

² North Dakota Electric Tariff Section 5, Sheet 92.

³ North Dakota Rule 69-09-02-10 part 3 states that “The utility *may* obtain the meter readings on a form supplied to the customer...”

months. If the billing period is longer or shorter than the normal billing period by more than five days, the bill shall be prorated on a daily basis except for the November, December, January, and February billing periods whereby the bill shall be prorated on a daily basis whenever the billing period is less than 25 days or more than 40 days.

3.7 ESTIMATED BILLS

An estimated bill will be rendered if the Company is unable to read the meter ~~or customer fails to supply a meter reading form~~ in time for the billing operation or in cases of emergency. If necessary, an adjustment will be made in the bill based on the next meter reading.

Attachment A shows the proposed changes in both redline and clean versions. The Company proposes that the requested tariff modifications would go into effect immediately upon Commission approval. Customers would be able to self-read their meter until they receive their new AMI meter. We will submit a compliance with the final tariffs within 10 days of the Commission Order.

V. CONCLUSION

The tariff modifications we request in this Application are in the public interest because customer self-reading of meters will no longer be possible due to the configuration and capabilities of the new AMI meters. These changes will avoid customer confusion. We respectfully request the Commission to approve the following:

- A modification to North Dakota Electric Rate Book Section 6, Sheet 16.
- A modification to North Dakota Electric Rate Book Section 6, Sheet 17.

Dated: May 3, 2024

Northern States Power Company

Legislative

3.2 METHOD OF DETERMINING DEMAND FOR BILLING PURPOSES

The actual demand in kW is defined as the greatest 15-minute average load during the billing period. For determining the adjusted demand, the actual demand may require application of the average power factor, which is defined as the quotient obtained by dividing the kilowatt-hours used during the month by the square root of the sum of the squares of the kilowatt-hours used and the lagging reactive kilovolt-ampere-hours supplied during the same period. Any leading kilovolt-ampere-hours supplied during the period will not be considered in determining the average power factor. The demand for billing shall be determined as shown in the respective rate schedule.

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Bills will normally be rendered monthly and may be paid by mail, or electronic or phone options, or to ~~its~~^{the} Company's duly authorized agents during regular business hours. A "month", as used for billing purposes, does not mean a calendar month, but means the interval between two consecutive periodic meter reading dates which are, as nearly as practicable, at 30 day intervals. The Company may read certain meters less frequently than once each billing month ~~for customers under the Company's self meter reading procedure, or when the Company and customers otherwise mutually agree~~, except that ~~the~~^{the} ~~Company representative~~ will read the meter at least once ~~each~~^{every} three (3) months. If the billing period is longer or shorter than the normal billing period by more than five days, the bill shall be prorated on a daily basis except for the November, December, January, and February billing periods whereby the bill shall be prorated on a daily basis whenever the billing period is less than 25 days or more than 40 days.

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3.4 AVERAGE MONTHLY PAYMENT PLAN

Qualified customers may, at their request, be billed under the Company's Average Monthly Payment (AMP) plan. Such plan shall generally levelize a customer's monthly payments based on their historical use. The Company will initially establish the customer's AMP payment and subsequently review the monthly amount at least once per year to ascertain its reasonableness compared to the customer's projected annual bill using current rates. The monthly AMP payment will be adjusted up or down such that the customer's annual payments closely approximate what their annual costs would be under tariffed rates. The billing for any true-up month will reflect the actual billing for the month adjusted for the credit or debit balance carried forward from the previous month.

3.5 LATE-PAYMENT CHARGE

A late-payment charge of 1.0% of the unpaid balance will be added to the unpaid balance two working days after the date due. Customers under the Average Monthly Payment Plan or a payment arrangement will be assessed a late payment charge on the lesser of the outstanding scheduled payments or the outstanding account balance. All payments received will be credited against the oldest outstanding total account balance before application of the late payment charge. The late payment charge will be waived in instances where a Company error is involved or where complications arise with financial institutions in processing automatic electronic payments.

3.6 BILL DATE DUE

Bills are due and payable upon presentation. For purposes of applying the late payment charge, the date due shown on the customer's bill shall be:

Classification of Customer	Date Due
Large Commercial & Industrial Customers	Not less than 15 days from current billing date.
All Other Customers	Not more than five days before next scheduled billing date.

Residential and Small Commercial and Industrial Customers have the option of selecting a modified due date for paying their bill. The due date can be extended up to a maximum of 14 calendar days from the normal date. Customer selecting a modified due date will remain on that due date for a period not less than 12 months or may change back to the normal due date anytime.

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3.8 BILLING ADJUSTMENTS

In General:

In the event of a meter or billing error resulting from:

- (1) an inaccurate meter;
- (2) an incorrect reading of the meter;
- (3) incorrect application of a rate schedule;
- (4) incorrect connection of the meter;
- (5) application of an incorrect multiplier or constant;
- (6) bill delay;
- (7) or other similar errors affecting billing as defined by the Public Service Commission's rule, the Company shall recalculate the customer's bill consistent with the Public Service Commission's rules and tariffs.

(Continued on Sheet No. 6-18)

Date Filed: ~~03-26-21~~⁰⁵⁻⁰³⁻²¹ By: ~~Christopher B. Clark~~^{Ryan J. Long} Effective Date: ~~10-01-21~~
President, Northern States Power Company, a Minnesota corporation
Case No. ~~PU-20-44124-~~ Order Date: ~~08-18-21~~

Non-Legislative

3.2 METHOD OF DETERMINING DEMAND FOR BILLING PURPOSES

The actual demand in kW is defined as the greatest 15-minute average load during the billing period. For determining the adjusted demand, the actual demand may require application of the average power factor, which is defined as the quotient obtained by dividing the kilowatt-hours used during the month by the square root of the sum of the squares of the kilowatt-hours used and the lagging reactive kilovolt-ampere-hours supplied during the same period. Any leading kilovolt-ampere-hours supplied during the period will not be considered in determining the average power factor. The demand for billing shall be determined as shown in the respective rate schedule.

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(Continued on Sheet No. 6-18)

Date Filed: 05-03-24

By: Ryan J. Long

Effective Date:

President, Northern States Power Company, a Minnesota corporation

Case No. PU-24-

Order Date: