

January 29, 2020

Ryan Barlow
Acting Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E1111/M-19-674

Dear Mr. Barlow:

Attached are the comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the following matter:

Dakota Electric Association's 2019 Integrated Distribution Plan

As discussed in the attached comments, the Department provides its response to the Minnesota Public Utilities Commission's (Commission) December 4, 2019 *Notice of Comment Period on Dakota Electric Association's 2019 Integrated Distribution Plan*.

At this time, the Department offers certain amendments to the Commission's *Minnesota Integrated Distribution Planning Requirements for Dakota Electric Association*. The Department will provide final recommendations after reviewing Dakota Electric Association's Reply Comments.

Sincerely,

/s/ MATTHEW LANDI
Rates Analyst

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Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce
Division of Energy Resources

Docket No. E111/M-19-674

I. BACKGROUND

Over the past several years, the Minnesota Public Utilities Commission (Commission) has investigated utility distribution system planning and the modernization of the electric grid as it pertains to investor-owned utilities generally in Docket No. E999/CI-15-556 (Grid Modernization docket). The Grid Modernization docket was discussed at the Commission's April 19, 2018 agenda meeting, in which the Commission reviewed the draft Integrated Distribution Plan (IDP) filing requirements developed through a Commission-led stakeholder process and heard party comments. The proposed requirements direct utilities to file plans addressing: long-term distribution system modifications and investments, considerations used in related planning processes, and long-term distribution system future outlooks, among other requirements.

On February 20, 2019, the Commission issued its *Order Adopting Integrated Distribution Plan Filing Requirements* in Docket No. E017/CI-18-253, E015/M-18-254, and E111/CI-18-255 (the Order) establishing IDP filing requirements and deadlines for Otter Tail Power Company, Minnesota Power, and Dakota Electric Association (DEA, or the Company), respectively. The Order directed the utilities to file their first IDPs by November 1, 2019.

As required, DEA subsequently filed its first IDP in this proceeding. On December 4, 2019, the Commission issued a *Notice of Comment Period* (Notice). The notice reaffirmed the purpose of the Commission's Integrated Distribution Plan (IDP) filing requirements:

- Maintain and enhance the safety, security, reliability, and resilience of the electric grid, at fair and reasonable costs, consistent with the state's energy policies;
- Enable greater customer engagement, empowerment, and options for energy services;
- Move toward the creation of efficient, cost-effective, accessible grid platforms for new products, new services, and opportunities for adoption of new distributed technologies;
- Ensure optimized utilization of electricity grid assets and resources to minimize total system costs; and
- Provide the Commission with the information necessary to understand the utility's short-term and long-term distribution-system plans, the costs and benefits of the specific investments, and a comprehensive analysis of ratepayer cost and value.

The Commission's Notice also included the following topics open for comment:

1. Should the Commission accept or reject Dakota Electric Association's Integrated Distribution Plan (IDP)?
2. Does the IDP filed by Dakota Electric Association achieve the planning objectives in the filing requirements approved in the Commission's February 20, 2019 Order?
3. What IDP filing requirements provided the most value to the process and why?
4. Are there filing requirements that are not informative and/or should be deleted or modified, and why?
5. Are there other issues or concerns related to this matter?

II. DEPARTMENT ANALYSIS

The Minnesota Department of Commerce, Division of Energy Resources (Department) views the Company's initial foray into producing the IDP Report in compliance with the Commission's Order as foundational: the first IDP Report should be generally viewed as the nascent attempt at an iterative process that will yield greater insight and transparency into the Company's distribution system planning and operations processes.

In this view, the Department believes that the IDP Report is first and foremost an instructive guide to the Company's internal distribution system planning and operations processes. Utility distribution systems have historically functioned without substantial oversight of regulators. Consequently, an informational asymmetry between the utility and regulators has developed, with regulators having minimal understanding of utilities' distribution system planning and operations processes.

Therefore, the Department views DEA's first IDP Report as the beginning of a dialogue between the utility, regulators, and stakeholders interested in the orderly, cost-efficient, and synergistic evolution of the distribution system. As emergent technologies lead to new possibilities and paradigms for electric utility customers and the electric utility business model, regulators and other stakeholders need to have a basic understanding of how electric utilities plan and operate their distribution systems.

Therefore, the Department's analysis here is limited to ensuring that the substantive requirements of the IDP Report have been fulfilled, and offering suggestions for potential improvements to future IDP reports and potential modifications to the IDP filing requirements.

The Department's analysis that follows is framed in response to the Commission's Notice.

A. ACCEPTANCE OF DAKOTA ELECTRIC ASSOCIATION'S IDP

The Department views DEA's first IDP Report as detailed, thorough, and instructive. The Department appreciates the Company's considerable efforts in compiling this report and complying with the IDP

Requirements set forth in the Commission's February 20, 2019 Order. However, due to some informational deficiencies related to the Commission's first planning objective, the Department is unable to offer a recommendation that the Commission accept DEA's IDP at this time. The Department will review the Company's Reply Comments and provide a recommendation in a supplemental filing.

B. ACHIEVEMENT OF THE PLANNING OBJECTIVES OF THE COMMISSION'S ORDER

The Planning Objectives outlined in the filing requirements approved by the Commission's February 20, 2019 Order are as follows:¹

Planning Objectives: The Commission is facilitating comprehensive, coordinated, transparent, integrated distribution plans to:

- Maintain and enhance the safety, security, reliability, and resilience of the electricity grid, at fair and reasonable costs, consistent with the state's energy policies;
- Enable greater customer engagement, empowerment, and options for energy services;
- Move toward the creation of efficient, cost-effective, accessible grid platforms for new products, new services, and opportunities for adoption of new distributed technologies;
- Ensure optimized utilization of electricity grid assets and resources to minimize total system costs; and
- Provide the Commission with the information necessary to understand the utility's short-term and long-term distribution system plans, the costs and benefits of specific investments, and a comprehensive analysis of ratepayer cost and value.

As noted above, the Department views DEA's initial IDP Report as foundational: it should be seen as an informational guide to the utility's internal distribution system planning and operations processes. As such, the IDP Report provides a baseline level of detail and discussion that can be used in the qualitative evaluation of future IDP reports.

In addition to this view, and given that that the IDP process is designed to be iterative and will necessarily evolve over time, the question of whether the planning objectives were achieved by the IDP Report is somewhat premature. Establishing the IDP Report as a baseline understanding of DEA's internal distribution system planning and operations processes will enable stakeholders to build off of the knowledge gained, and, with each successive report, a better qualitative assessment of whether the planning objectives are achieved can be conducted.

¹ [Order Adopting Integrated Distribution-Plan Filing Requirements](#), dated February 20, 2019, filed in Docket Nos. E017/CI-18-253, E015/CI-18-254, and E111/CI-18-255.

Accordingly, the Department’s review of the IDP Report focuses mainly on whether the Company provided information relevant to the planning objectives listed above such that future analyses can more qualitatively determine whether the outcomes that the planning objectives articulate can materialize over time with the information contained in the IDP report.

In determining whether the planning objectives were furthered by the IDP Report, the Department analyzed whether the Company went into a level of detail that yields a greater understanding of how the Company includes the objectives in: (1) its planning and/or operations processes; and/or (2) its future, planned initiatives and/or investments. While primarily a quantitative analysis, the Department’s assessment nevertheless attempts to qualitatively assess whether the substance of the IDP Report furthers the planning objectives.

1. *Planning Objective #1- Maintain and enhance the safety, security, reliability, and resilience of the electricity grid, at fair and reasonable costs, consistent with the state’s energy policies*

The Department’s analysis found that DEA’s IDP Report discussed some, but not all, of the topics listed in the first planning objective. The topics of maintaining and enhancing security and resiliency of the electricity grid were minimally referenced or not referenced at all in DEA’s IDP. The other planning topics—safety, reliability, and fair and reasonable costs—were discussed, however. The Department provides a high-level analysis of the location of these topics in the IDP Report in Table 1 below.

Table 1. Location of Topics of the First Planning Objective in Xcel’s IDP Report

TOPIC	PAGE #
Safety	Introduction, Section 2, at 6. Section C.5, at 55, 57. Section D.3, at 74.
Security	
Reliability	Introduction, Section 3, at 5-8. Section A.3, at 19. Section A.26, at 38-39. Section A.27, at 40. Section A.28, at 40-42. Section A.29, at 43. Section A.30, at 45. Section C.5, at 55, 57. Section D.3, at 74. Section E.3, at 81. Section E.4, at 83. Section E.5, at 85, 89, 98. Section E.6, at 98. Section E.9, at 99. Section E.12, at 112. Section E.15, at 123. Appendix B, Section 9, at 6.
Resilience	
Fair and Reasonable Costs	Introduction, Section 4, at 10. Introduction, Section 7, at 15. Section A.5, at 21. Section A.30, at 44-45. Section C.5, at 56-58, 61. Section C.6, at 64-65. Section D.4, at 74. Section D.8, at 77. Section D.10-12, at 77-78. Section E.3, at 81-82. Section E.4, at 84. Section E.5, at 85-98. Section E.8, at 99. Section E.9, at 99. Section E.11, at 105-111. Section E.12, at 114-116. Section E.13, at 118-121. Section E.17, at 124-125.
Consistent with State Energy Policies	Section C.5 and C.6, at 55-65.

Given the lack of information regarding efforts to maintain and enhance security and resilience of the electric grid in DEA's IDP Report, the Department is unable to conclude that DEA's IDP discussed each of the topics in the first planning objective in sufficient detail.

Accordingly, the Department requests that DEA provide a discussion of how DEA maintains and enhances security and resilience of the electricity grid in Reply Comments.

2. Planning Objective #2 - Enable greater customer engagement, empowerment, and options for energy services

Overall, the Department notes that the Company's IDP Report provided information and discussion related to the second planning objective. The Department highlights some of the elements of the IDP Report that are related to the second planning objective.

A main element of the Company's IDP Report is its detailed explanation and provision of data related to its Advanced Grid Infrastructure (AGI) Project, which, among other benefits, is expected to enable greater customer engagement, empowerment, and options for energy services. The Company provided a succinct overview of the AGI Project on page 80, as follows:

[T]he AGI project is designed to provide a foundation for the future. The project is designed to provide a platform that other functions can utilize to help the members and the overall operation of the distribution system. One of the benefits of the AGI project is the operational information gathered by the communicating digital meters to improve the integration of DER generation systems. The AGI project is considered by Dakota Electric as a non-wires project as it will provide Dakota Electric with greater knowledge of how the distribution system is performing and operating and support a more efficient construction and operation of the distribution system. The AGI project is Dakota Electric's focus to modernize the utility's grid and provide additional information to the members on how they use electrical energy.

DEA explained that the organizing principle of its specific efforts related to the AGI Project and its general efforts to enhance its distribution system can be explained by the term Transactive Energy:²

Transactive Energy refers to the economic and control techniques used to manage the flow or exchange of energy within an existing electric power system in regards to economic and market-based standard values of energy.

² [Dakota Electric Association 2019 IDP Report](#), dated November 1, 2019, at 69, citing the 2019 IEEE PES Transactive Energy System Conference website.

It is a concept that is used in an effort to improve the efficiency and reliability of the power system, pointing towards a more intelligent and interactive future for the energy industry.

Transactive energy promotes a network environment for distributed energy nodes as opposed to the traditional hierarchical grid structure. The network structure allows for communication such that all levels of energy generation and consumption are able to directly interact with one another.

The Company later explained that, in practice, the Transactive Energy concept led to Company's development and implementation of the AGi Project specifically:³

As a concept, Transactive Energy appears to be a very flexible and enabling concept. In actual practice, to achieve a fully transactive energy exchange state, significant changes to the electrical grid, large investments in secure communication infrastructure, development of new economic constructs, and significant replacement of consumer's appliances with interactive units will need to occur. Dakota Electric is working towards a more interactive distribution system and one that provides the members with more granular information regarding the energy being consumed. The future interactive distribution system will also include more information for the members about how members are generating energy, if the member has installed renewable energy resources. This information will be available not only for Dakota Electric to use to improve the efficiency of the distribution system, but most importantly for the members to better understand how they use energy. To accomplish this, Dakota Electric's Five-Year Action Plan for enhancing the distribution grid is focused on the completion of the AGi project. The AGi project includes:

- The installation of a meshed Radio Frequency (RF) communication network.
- Replacing of all of the existing metering with digital two-way communicating meters, typically referred to as AMI (Advanced Metering Infrastructure).
- The addition of a Meter Data Management System (MDMS) which will store the vast amount of metering data, including alarms and events from the edge devices.
- The replacement of all of the existing 50,000+ load management receivers which are mounted on the side of the member's homes and business.

³ IDP Report, at 69-70.

Specifically related to customer engagement, empowerment, and options for energy services, the Company explained that the AGi Project is expected to “enable greater member engagement by providing more information to the member on how they use energy” and “empower the members to help them identify energy saving opportunities and provide information to help the member utilize other rate options.”⁴

The IDP Report provides detailed references to how DEA’s distribution system planning processes are in part designed to enable greater customer engagement, empowerment, and options for energy services. The Department notes that this list is not exhaustive of the items discussed in the IDP Report that relate to the second planning objective. The Department concludes that the Company provided extensive information and discussion of items related to the second planning objective.

3. Planning Objective #3 - Move toward the creation of efficient, cost-effective, accessible grid platforms for new products, new services, and opportunities for adoption of new distributed technologies

Overall, the Department notes that the Company’s IDP Report provided information and discussion related to the third planning objective.

On page 15 of the IDP Report, the Company explained that its legacy program offering a renewable energy option for its members—the Wellspring Renewable Energy program—has led to continued refinement of its offerings to members that enable a member to obtain some or all of their electrical needs from renewable resources. Consequently, the Company now offers a solar PV option for its membership.

On page 19, the Company explained that its Supervisory Control and Data Acquisition (SCADA) system enables it to provide an interruptible, demand response /load management program (C&I Interruptible – Rate 70). Also on page 19, the Company noted that while 100% of substations have SCADA monitoring, less than 10% of feeders have some type of SCADA monitoring. The Company explained that its visibility of the distribution system was intended to be greatly improved by the AGi Project, which involves replacing existing metering and load control infrastructure, and enables two-way communication that records members’ usage every 15 minutes and sends that data to the Company every 4 hours, and also provides the Company with information about average, minimum, and maximum voltages during each of the 15-minute periods.⁵

Later in the IDP Report, on pages 73 and 74, the Company provided an overview of the grid architecture and what implications the AGi Project has for the future of its distribution system and the services it can offer to members:

⁴ IDP Report, at 77.

⁵ IDP Report, at 19.

Dakota Electric believes that it must begin preparing for a future state that integrates many technologies not present today but will require advanced capabilities for monitoring, communication and control. The system-wide communication network provided by the installation of the AGi system will support future operational monitoring. This monitoring will be required to support the operation of the system with the installation of renewables, such as solar. Together these advanced grid systems will provide options for Dakota Electric to increase service levels and meet the future expectations of the members. The AGi technology will also provide the foundation and flexibility for Dakota Electric to respond to emerging issues as they arise.

The Department notes that this list is not exhaustive of the items discussed in the IDP Report that relate to the third planning objective. The Department concludes that the Company provided extensive information and discussion of items related to the third planning objective.

4. Planning Objective #4 - Ensure optimized utilization of electricity grid assets and resources to minimize total system costs

Overall, the Department notes that the Company's IDP Report provided information and discussion related to the fourth planning objective.

In section D.4 on page 74, the Company explained that its decision to invest in the AGi Project is best understood in the context of the status quo, which would have involved spending a comparable amount of money to maintain and install technology that did not have the "additional services and operational flexibility benefits the new technology" offers.

In Section D.5 on pages 74 through 76, the Company explained that its approach to system interoperability has a long history that includes installation of the SCADA system in the 1990s, which allowed for the remote control and monitoring of substations and member-owned generation. In 2009, the Company continued the interoperability and installation of data management platforms by investing in GIS and work management systems, which created "a data hub supporting near-real time network connectivity model and graphical representation of the electrical distribution system data" and created "a construction management system where all parties involved with the design, approval, procurement and construction of a project used the same set of systems with access to the same data."

On page 76, the Company explained that its AGi Project is designed to continue its integration philosophy, which will "continue the integration of many of the other islands of data" and will help enable the "creation of an accessible grid that will support new products, new services and will provide opportunities for integration of distributed technologies." The Company also expressed a note of caution, however, indicating that it is currently unclear what next interoperability steps will be required once the AGi project has been completed and what interoperability requirements are needed to support Transactive Energy.

On page 77, the Company projected a slight increase in costs incurred by members over the next few years as a result of implementing the AGi Project, but that the AGi system is “expected to moderate future increases in costs of delivering electrical services to the members and provide increased options for the members.” In Section D.10, the Company stated that the “implementation of the AGi project will only enhance the ability of the members to make informed choices by providing members with more information on their energy use.”⁶

In terms of system costs, as alluded to earlier in the IDP Report, the Company explained that it was expecting to spend similar amounts of money on implementing and maintaining old technology without the benefits of that the AGi Project will provide. Further, the Company stated that the AGi Project’s lifetime costs are expected to be offset by the benefits received.⁷

The Department notes that this list is not exhaustive of the items discussed in the IDP Report that relate to optimizing utilization of electricity grid assets and resources to minimize total system costs. The Department concludes that the Company provided extensive information and discussion of items related to the fourth planning objective.

5. *Planning Objective #5 - Provide the Commission with the information necessary to understand the utility’s short-term and long-term distribution system plans, the costs and benefits of specific investments, and a comprehensive analysis of ratepayer cost and value*

The Department notes that the Company’s IDP Report provided information and discussion related to the fifth planning objective, however defers to the Commission as to whether the information provided was sufficiently comprehensive.

6. *Conclusion*

The Department again notes that our analysis of the IDP Report and the Commission’s Planning Objectives is not an exhaustive review of the IDP Report. Instead, as stated, since this is DEA’s first IDP Report, the Department’s review focused on whether the Company provided information relevant to the planning objectives listed above and provided a starting point for future analyses that seek to ascertain whether the outcomes of the planning objectives are being actualized with each iteration of the IDP Report.

Much of the information contained in the IDP Report is relevant to the Commission’s planning objectives and contains a sufficient amount of information to assess whether outcomes that the planning objectives articulate can materialize over time. However, given the Department’s discussion above related to the Commission’s first planning objective, the Department cannot conclude that the Company’s inaugural IDP Report fully provides the requisite information. The Department appreciates

⁶ IDP Report, at 78.

⁷ IDP Report, at 78.

the Company's good faith efforts to provide an extensive amount of information and looks forward to reviewing the Company's response to the Department's request for additional information related to the first planning objective.

The Department also notes that, in Docket No. E002/CI-18-251, the Commission required Xcel Energy to perform a self-assessment of whether its IDP Report meets the Commission's planning objectives. Order Point #5 of the Commission's Order in that proceeding states:⁸

Xcel shall discuss in future filings how the IDP meets the Commission's Planning Objectives, including:

- A. An analysis of how the information presented in the IDP related to each Planning Objective,
- B. The location in the IDP,
- C. Analysis of efforts taken by the Company to improve upon the fulfillment of the Planning Objectives, and
- D. Suggestions as to any refinements to the IDP filing requirements that would enhance Xcel's ability to meet the Planning Objectives.

Should the Commission continue to be interested in determining whether DEA's IDP Report achieves the Commission's planning objectives, the Department recommends adopting the above-referenced Order Point from Xcel's IDP proceeding in this one as well.

The Department recommends that the Commission require Dakota Electric Association to discuss in future filings how the IDP meets the Commission's Planning Objectives, including:

- A. An analysis of how the information presented in the IDP related to each Planning Objective,**
- B. The location in the IDP,**
- C. Analysis of efforts taken by the Company to improve upon the fulfillment of the Planning Objectives, and**
- D. Suggestions as to any refinements to the IDP filing requirements that would enhance Dakota Electric Association's ability to meet the Planning Objectives. (Recommendation 1)**

C. FILING REQUIREMENTS PROVIDING THE MOST VALUE

In general, the Department's position regarding distribution system planning has focused on three overarching themes: (1) distribution system planning should itself be cost-effective and lead to outcomes that are also cost-effective; (2) distribution system planning reporting should correct a historic, long-term information asymmetry between regulators and utilities; and (3) IDP requirements between utilities should be consistent to the greatest extent practicable.

⁸ [Order Accepting Report, and Amending Requirements](#), dated July 16, 2019, filed in Docket No. E002/CI-18-251.

IDP requirements that are responsive to these three themes are ones that the Department supports in principle. In practice, however, there exists the possibility that specific IDP requirements may be ineffective, superfluous, or worse, contravene the intent of distribution system planning and create opportunities for utilities to justify unnecessary expenditures of ratepayer funds.

At this nascent stage of the IDP process, however, it may be difficult to conclude which filing requirements provide the most value to the process, and conversely, which filing requirements do not provide value. It is important to ensure that IDP requirements and investments are reasonable and expected to lead to greater technical or economic efficiencies that are demonstrably beneficial to ratepayers and in the public interest. The Department expects future iterations of IDP Reports, and any utility investment proposals that are derivative of the IDP Reports, to shed light onto whether the distribution system planning process created by the Commission is leading to the intended outcomes.

Likewise, to the extent that this first IDP Report serves as a baseline to which future IDP Reports can be compared, the Department views DEA's first IDP Report as foundational and expects to be able to assess the value of the distribution system planning process in general and the IDP requirements specifically in a more comprehensive and measured way in its review of subsequent IDP Reports.

Last, it is important that IDP Requirements between utilities should be as consistent as possible for a number of reasons: (1) to avoid creating a confusing regulatory morass of varied and disjunctive IDP Requirements between utilities; (2) to enable utilities, regulators, and Minnesota's stakeholder community to learn best practices and share lessons learned based on consistent information; (3) to enable a more uniform, transparent, and reproducible analysis of costs and benefits of utility investments in their distribution systems; and (4) to lead to uniform and interoperable technological solutions or planning processes that create economies of scale, enable more efficient and cost-effective distributed energy resource integration, improve system efficiency, and ultimately, reduce costs and increase benefits for Minnesota's ratepayers.

The Department maintains that an important focus for DEA and other stakeholders should be on the "low-hanging fruit" of the distribution system: improvements that are likely to be beneficial to ratepayers regardless of the speed or scale of the technological change affecting the distribution system. These "no regrets" policies are demonstrably positive for ratepayers and utilities, and could result in better technical and economic efficiencies, and would not preclude even more beneficial outcomes (i.e. any action or investment avoids any lock-in effects). The Department expects to be able to assess which IDP Requirements are most beneficial and lead to a focus on the "low-hanging fruit" as the IDP process evolves and future iterations are made.

D. FILING REQUIREMENTS THAT REQUIRE MODIFICATION OR DELETION

Consistent with the Department's position that utility IDP Requirements should be as consistent to the greatest extent practicable, the Department has two recommendations regarding modifications that the Commission made to Xcel's IDP Requirements in Docket No. E002/CI-18-251 in its July 16, 2019

Order that the Department believes would be appropriate to make to DEA's IDP Requirements. They are as follows:

Order Point #3 of the Commission's July 16, 2019 Order in Docket No. E002/CI-18-251 amended IDP Requirement 3.D.2 (xi) to read as follows:

For each grid modernization project in its 5-year Action Plan, require Xcel to provide a cost-benefit analysis based on the best information it has at the time and include a discussion of non-quantifiable benefits. Xcel shall provide all information to support its analysis.

The Department recommends that the Commission amend IDP Requirement 3.D.2 (xi) of Dakota Electric Association's IDP Requirements to read as follows:

For each grid modernization project in its 5-year Action Plan, require Dakota Electric Association to provide a cost-benefit analysis based on the best information it has at the time and include a discussion of non-quantifiable benefits. Dakota Electric Association shall provide all information to support its analysis. (Recommendation 2)

Order Point #4 of the Commission's July 16, 2019 Order in Docket No. E002/CI-18-251 merged IDP Requirements 3.D.1 and 3.D.2 to read as follows:

Xcel shall provide a 5-year Action Plan as part of a 10-year long-term plan for distribution system developments and investments in grid modernization based on internal business plans and considering the insights gained from the DER futures analysis, hosting capacity analysis, and non-wire alternatives analysis. The 5-year Action Plan should include a detailed discussion of the underlying assumptions (including load growth assumptions) and the costs of distribution system investments planned for the next 5-years (expanding on topics and categories listed above). Xcel should include specifics of the 5-year Action Plan investments. Topics that should be discussed, as appropriate, include at a minimum: [footnote omitted]

The Department recommends that the Commission merge IDP Requirement 3.D.1 and 3.D.2 of Dakota Electric Association's IDP Requirements to read as follows:

Dakota Electric Association shall provide a 5-year Action Plan as part of a 10-year long-term plan for distribution system developments and investments in grid modernization based on internal business plans and considering the insights gained from the DER futures analysis, hosting capacity analysis, and non-wire alternatives analysis. The 5-year Action

Plan should include a detailed discussion of the underlying assumptions (including load growth assumptions) and the costs of distribution system investments planned for the next 5-years (expanding on topics and categories listed above). Dakota Electric Association should include specifics of the 5-year Action Plan investments. Topics that should be discussed, as appropriate, include at a minimum: (Recommendation 3)

The Department notes that DEA included a section (pages 126-128) providing feedback on and listing suggested changes to particular reporting requirements in light of certain challenges in gathering the information and/or lack of definitional clarity or intent.

It is important to note that the IDP Requirements contemplate instances where furnishing the requisite information may be impracticable or cost-prohibitive.⁹ The IDP Requirements state:

For filing requirements which Dakota Electric claims is not yet practicable or is currently cost-prohibitive to provide, Dakota Electric shall indicate for each requirement:

1. Why the Company has claimed the information is not yet practicable or is currently cost-prohibitive;
2. How the information could be obtained, at what estimated cost, and timeframe;
3. What the benefits or limitations of filing the data in future reports as related to achieving the planning objectives;
4. If the information cannot be provided in future reports, what information in the alternative could be provided and how it would achieve the planning objectives.

The Company provided feedback on the following IDP Requirements:

- Section A.15. Total costs spent on DER generation installation in the prior year. These costs should be broken down by category (including application review, respond to inquiries, metering, testing, make ready, etc.)
- Section A.16. Total charges to customers/member installers for DER generation installations, in the prior year. These costs should be broken down by category in which they were incurred (including application, fees, metering, make ready, etc.)
- Section A.29. Planned distribution capital projects, including drivers for the project, timeline for improvement, and summary of anticipated changes in historic spending. Driver categories should include:

⁹ See *Minnesota Integrated Distribution Planning Requirements for Dakota Electric Association* in the Commission's February 20, 2019 Order in Docket No. E111/CI-18-255.

- a. Age-Related Replacements and Asset Renewal
 - b. System Expansion or Upgrades for Capacity
 - c. System Expansion or Upgrades for Reliability and Power Quality
 - d. New Customer Projects and New Revenue
 - e. Grid Modernization and Pilot Projects
 - f. Projects related to local (or other) government-requirements
 - g. Metering
 - h. Other
- Section B. Preliminary Hosting Capacity Data
 - 1. Provide an excel spreadsheet (or other equivalent format) by feeder of either daytime minimum load (daily, if available) or, if daytime minimum load is not available, peak load (time granularity should be specified)

The Department appreciates the thoughtful feedback provided by the Company and notes that this type of feedback is instructive for all parties involved and can help facilitate a more meaningful process and more substantive outcomes.

DEA made a general statement to “encourage a process and review of the information requests so that the data included in future IDPs is efficiently gathered and presented” and contemplated a specific method to complete this review and discussion by creating a working group of stakeholders to review and discuss a draft of the Commission’s IDP order for the next round of IDP reports.¹⁰

DEA also specifically requested that future IDP reports include “substation minimum load data” instead of the individual feeder minimum load levels.”¹¹ The Company explained that it “found the limiting level for DER integration to the point when the substation back feeds the transmission system” and that “knowing substation minimum load would be more useful than knowing the individual feeder minimum loads.”¹²

The Department does not object to nor takes issue with DEA’s feedback and suggestions.

E. OTHER ISSUES

The fifth topic of the Commission’s Notice asks whether there are other issues or concerns related to this matter.

The Department does not have any other issues or concerns related to this matter at this time.

¹⁰ IDP Report, at 126.

¹¹ IDP Report, at 127.

¹² IDP Report, at 128.

III. DEPARTMENT RECOMMENDATIONS

The Department appreciates the opportunity to comment on DEA's 2019 IDP and looks forward to the review of other stakeholder comments. The Department makes the following recommendations:

- **The Department recommends that the Commission require Dakota Electric Association to discuss in future filings how the IDP meets the Commission's Planning Objectives, including:**
 - A. An analysis of how the information presented in the IDP related to each Planning Objective,
 - B. The location in the IDP,
 - C. Analysis of efforts taken by the Company to improve upon the fulfillment of the Planning Objectives, and
 - D. Suggestions as to any refinements to the IDP filing requirements that would enhance Dakota Electric Association's ability to meet the Planning Objectives. (Recommendation 1)

- **The Department recommends that the Commission amend IDP Requirement 3.D.2 (xi) of Dakota Electric Association's IDP Requirements to read as follows:**

For each grid modernization project in its 5-year Action Plan, require Dakota Electric Association to provide a cost-benefit analysis based on the best information it has at the time and include a discussion of non-quantifiable benefits. Dakota Electric Association shall provide all information to support its analysis. (Recommendation 2)

- **The Department recommends that the Commission merge IDP Requirement 3.D.1 and 3.D.2 of Dakota Electric Association's IDP Requirements to read as follows:**

Dakota Electric Association shall provide a 5-year Action Plan as part of a 10-year long-term plan for distribution system developments and investments in grid modernization based on internal business plans and considering the insights gained from the DER futures analysis, hosting capacity analysis, and non-wire alternatives analysis. The 5-year Action Plan should include a detailed discussion of the underlying assumptions (including load growth assumptions) and the costs of distribution system investments planned for the next 5-years (expanding on topics and categories listed above). Dakota Electric Association should include specifics of the 5-year Action Plan investments. Topics that should be discussed, as appropriate, include at a minimum: (Recommendation 3)

The Department requests that, in Reply Comments, DEA provide a discussion of how DEA maintains and enhances the security and resiliency of the electricity grid.

/ar

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

Minnesota Department of Commerce
Comments

Docket No. E111/M-19-674

Dated this **29th** day of **January 2020**

/s/Sharon Ferguson

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