

September 7, 2018

Daniel P. Wolf
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. E017/CI-18-253

Dear Mr. Wolf:

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

Distribution System Planning for Otter Tail Power Company.

As discussed in the attached comments, the Department provides its response to the Minnesota Public Utilities Commission's (Commission) June 12, 2018 *Notice of Comment Period on Draft Integrated Distribution Planning (IDP) Requirements*.

The Department is available to respond to any questions the Commission may have on this matter.

Sincerely,

/s/ MATTHEW LANDI
Rates Analyst

ML/ja
Attachment



Before the Minnesota Public Utilities Commission

Reply Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. E017/CI-18-253

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 June 12, 2018, the Commission issued a *Notice of Comment Period on Draft Integrated Distribution Planning (IDP) Requirements* (Notice) for Otter Tail Power (Otter Tail or OTP). Specifically, the Notice states:

The Commission requires that OTP provide, as early as possible, but by the close of the initial comment period, a narrative on the Company's proposed distribution energy resource penetration scenarios for the 2018 Integrated Distribution Plan (IDP). The scenarios in the narrative should thoroughly detail the inputs and assumptions made.

The Notice lists the following four topics open for comment:

1. Should the attached [to the Notice] draft IDP requirements be modified? If so, provide specific edits with rationale and indicate the intent of the proposed change.
2. Are there specific scenarios, inputs, or assumptions that OTP should consider in its initial filing? What are reasonable medium and high scenarios (C2)?
3. Please address the following areas (in reference to the attached draft IDP requirements):

- a) Are the annual or biennial filing requirements reasonable?
 - b) Are there additional parameters or requirements that should be part of 2. Stakeholder Meetings?
 - c) Should the categories under Financial Data (A19) be modified? Are there consistent categories across utilities that could be utilized?
 - d) Should the Long-Term Distribution System Plan components (Section D) be on a 10-year (shorter term) outlook or a 15-year outlook (to correspond with Integrated Resource Plan timing)?
4. Are there other issues or concerns related to this matter?

II. DEPARTMENT ANALYSIS

The Department offers the following introductory comments and response to the specific topics listed in the Notice.

A. INTRODUCTORY COMMENTS

The Department's focus of these introductory comments is three-fold: (1) to stress the importance of cost-effectiveness in the distribution system planning process and in the outcome of distribution planning; (2) to indicate support for seeking information about distribution system planning; and (3) to advocate for consistent IDP requirements between utilities to the greatest extent practicable.

1. *Distribution System Planning Should Be Cost-Effective*

As indicated in Xcel Energy's (Xcel) IDP proceeding,¹ the Department is most concerned with the cost-effectiveness of any distribution system planning. Given the existing information asymmetry between regulators and Minnesota's utilities, the Department is unaware of utilities' current ability, or their ability to reasonably and cost-effectively develop the capacity, to fulfill the requirements of the proposed IDP.

It is important to understand the cost-effectiveness of any enhanced distribution system planning requirements. Moreover, it is important to ensure that IDP requirements and investments are reasonably expected to lead to greater technical or economic efficiencies that are demonstrably beneficial to ratepayers and in the public interest.

¹ *In the Matter of Distribution System Planning for Xcel Energy*, Docket No. E002/CI-18-251.

2. IDP Reporting Requirements Appear Reasonable, as Modified Below

The Department believes that, at a minimum, it is prudent to develop a greater understanding of OTP's current planning for its distribution system. It would also be prudent to understand whether OTP already can or reasonably could in the foreseeable future develop capabilities to comply with the draft IDP requirements. Finally, it would be helpful to understand OTP's current disposition toward distribution system planning. Generally, to the extent that OTP is currently able to comply, or would be able to develop such capacity in a reasonable and cost-effective manner, with the draft IDP requirements in time for a November 1, 2019 filing, the Department is supportive of this effort.

The Department particularly supports the Commission's proposal to obtain information, with the aim to provide the Commission and stakeholders with insight into OTP's distribution system and its planning processes. The current informational asymmetry precludes more thoughtful analysis that could help the Commission reasonably guide or assess distribution system investments that would result in a more efficient allocation of ratepayer resources and potentially better outcomes. For example, it may or may not be reasonable for OTP to pursue technological advancements to improve the efficiency and reliability of its distribution system, expanded integration of distributed energy resources if they benefit the distribution system, or other improvements. In addition, across utilities, there may be improvements such as leveraged economies of scale in distribution system planning and investments, information sharing between utilities to disseminate best practices and efficient uses of ratepayer resources and perhaps other outcomes that could result in quantifiable ratepayer benefits.

3. Utility IDP Requirements Should Be as Consistent as Possible

The Commission's August 30, 2018 *Order Approving Integrated Distribution Planning Filing Requirements for Xcel Energy* in Docket No. E002/CI-18-251 approved IDP requirements for Xcel that have a similar structure to the proposed IDP requirements for OTP.² Given its size and largely urban nature of Xcel's service territory, Xcel is likely better prepared and positioned than other Minnesota utilities to comply with the approved IDP requirements.³ However, the

² *Order Approving Integrated Distribution Planning Filing Requirements for Xcel Energy*, dated August 30, 2018, Docket No. E002/CI-18-251.

³ Xcel is also the only electric utility currently explicitly required to provide information about their distribution system, per Minnesota Statute §216B.2425:

Subd. 8. Distribution study for distributed generation.

Each entity subject to this section that is operating under a multiyear rate plan approved under section 216B.16, subdivision 19, shall conduct a distribution study to identify interconnection points on its distribution system for small-scale distributed generation resources and shall identify necessary distribution upgrades to support the continued development of distributed generation resources, and shall include the study in its report required under subdivision 2.

Department is supportive of draft IDP requirements for OTP that are as consistent with Xcel's IDP to the greatest extent practicable when appropriate, and is supportive of an evolutionary regulatory process that leads to consistent requirements between utilities to the greatest extent practicable.

The Department notes that it is important to adapt IDP requirements to the unique circumstances and characteristics of each utility such that a completely uniform set of requirements is likely precluded. Further, flexibility is an essential feature that should permeate throughout this regulatory effort. Utilities are likely to need time to adjust and grow into this regulatory paradigm as internal planning processes are exposed to regulatory oversight and are harmonized with the Commission's IDP requirements. As the IDP process matures, the Department anticipates that a process that converges rather than diverges planning requirements for each of Minnesota's utilities is likely to lead to the most optimal outcome for ratepayers and the public interest.

Consistent regulatory requirements and standards in Minnesota utilities' IDPs are likely to lead to better results for all of Minnesota's ratepayers than a paradigm where IDPs vary to the extent that they result in inconsistent criteria used to assess the costs and benefits of distribution system planning, investments, and operations. Distribution system planning informs utility capital budget construction budgets, which currently includes typical distribution system improvements, equipment replacements, and service extensions.⁴ Utilities also rely on load forecasts down to the individual substation or feeder, and modeling designed to identify system reliability helps prioritize required capital projects.⁵ It's important to understand how utilities plan their distribution systems to assess how utilities avoid creating lock-in effects that could prevent a utility from considering other options, how utilities capture the full consideration of various alternatives, how utilities share information, and how utilities ensure that their planning results in efficient uses of ratepayer resources.

Uniformity and interoperability may help position utilities to leverage future technological advancements, to achieve economies of scale, enable distributed energy resource integration, improve system efficiency, and ultimately, reduce costs and increase benefits for Minnesota's ratepayers.

As to the draft IDP reporting requirements, the Department maintains that an important focus for OTP 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

However, given the Commission's responsibilities and rights to ensure adequate and reliable service at reasonable rates, the Commission has the ability, at a minimum, to request further information from other investor-owned utilities.

⁴ See *Staff Briefing Papers for Docket No. CI-15-556; CI-18-251, 18-253, 18-254, 18-255*, dated April 19, 2018, at 8.

⁵ *Id.*

the technological change affecting the distribution system. These “no regrets” policies are demonstrably positive for ratepayers and utilities, 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 believes that there are small number of IDP requirements approved by the Commission in Xcel’s IDP that strike a balance between the long-run aspiration of IDP parity and the short-run need for flexibility, especially given the longer ramp that OTP has compared to Xcel. The Department’s comments below highlight these requirements and provide recommendations to adopt them for OTP. The Department will provide further, more substantive comments in response to the initial comments from OTP and other stakeholders.

B. TOPIC #1: Should the attached draft IDP requirements be modified? If so, provide specific edits with rationale and indicate the intent of the proposed change.

The Department provides the following proposed edits to the draft IDP requirements as presented by the Commission in the attachment to the Notice.

1. Planning Objectives

The Department believes there are two items under the *Planning Objectives* section of Xcel’s approved IDP that should also be included in OTP’s IDP. First, the Department supports the following addition (as modified so as to be applicable to OTP):

Provide the Commission with the information necessary to understand Otter Tail’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.

Second, the Department supports the following addition (as modified):

For filing requirements which OTP claims are not yet practicable or are currently cost-prohibitive to provide, OTP 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 Department believes that these two items, taken together, address the Department's concerns over the cost-effectiveness of distribution system planning and the utility's need for flexibility in complying with the IDP.

The Department therefore recommends that the above quoted requirements from the *Planning Objectives of Xcel's approved IDP Requirements* be adopted for OTP's IDP, modified as appropriate. (Recommendation 1)

2. *Distribution System Plan Process*

a. *Filing Date*

Xcel stated in its IDP proceeding that the planning horizon for distribution system planning was typically conducted on an annual or biannual basis, and that planning horizons beyond that are often subject to change as priorities and the system changes.⁶ The Commission incorporated Xcel's current planning horizon by including the following in the *Distribution System Plan Process* of Xcel's IDP Requirements (as modified so as to pertain to OTP):

1. **Filing Date:** Require Otter Tail to file biennially with the Commission beginning on November 1, 2019 an Integrated Distribution Plan (MN-IDP or IDP) for the 10-year period following the submittal...

To maintain consistency between filing requirements, and assuming that OTP's distribution system planning processes have similar temporal scales, **the Department recommends that OTP's IDP also reflect this 10-year planning horizon requirement. (Recommendation 2a)**

b. *Filing Requirements*

i. *Baseline Distribution System and Financial Data*

1. *System Data - Item #7*

In Xcel's IDP proceeding, the Commission approved a modification to Item #7 of the *System Data* requirements under the Baseline Distribution System and Financial Data subsection (subsection A) of the Filing Requirements section (section 3), to state:

Discussion if and how IEEE Std. 1547-2018 impacts distribution system planning considerations (e.g. opportunities and constraints related to interoperability and advanced inverter functionality).

⁶ Xcel's July 6, 2018 Comments at 17.

The Department recommends that *System Data* Item #7 from the Filing Requirements section from Xcel's IDP requirements be adopted for OTP's IDP requirements. (Recommendation 3)

2. System Data – Item #15

In Xcel's IDP proceeding, the Commission approved a modification to Item #15 of the *System Data* requirements under the Baseline Distribution System and Financial Data subsection (subsection A) of the Filing Requirements section (section 3) of Xcel's draft IDP requirements, as follows:

Total costs spent on DER generation installation in the prior year. These costs should be broken down by category in which they were incurred (including application review, responding to inquiries, metering, testing, make ready, etc.)

The Department believes that this modification would also be appropriate for OTP's IDP requirements, as it provides additional detail that will be helpful for planning purposes. **The Department recommends that *System Data* Item #17 from the Filing Requirements section of Xcel's IDP requirements also be adopted for OTP's IDP requirements. (Recommendation 4)**

3. System Data – Item #16

In Xcel's IDP proceeding, the Commission approved a modification to Item #16 of the *System Data* requirements under the Baseline Distribution System and Financial Data subsection (subsection A) of the Filing Requirements section (section 3) of Xcel's IDP requirements, as follows:

Total charges to customers/member installers for DER generation installations in the prior year. These charges should be broken down by category in which they were incurred (including application, fees, metering, make ready, etc.)

The Department believes that this modification would also be appropriate for OTP's IDP requirements, as it provides additional detail that may be helpful for planning purposes. **The Department recommends that *System Data* Item #16 from Xcel's IDP requirements be adopted for OTP's IDP requirements. (Recommendation 5)**

4. System Data – Item #17

In Xcel's IDP proceeding, the Commission approved a modification to Item #17 of the *System Data* requirements under the Baseline Distribution System and Financial Data subsection (subsection A) of the Filing Requirements section (section 3), as follows:

Total nameplate kW of DER generation system which completed interconnection to the system in the prior year, broken down by DER technology type (e.g. solar, combined solar/storage, storage, etc.)

The Department believes that this modification would also be appropriate for OTP's IDP requirements, as it provides additional, useful information to this requirement beyond what is provided in the annual cogeneration and small power producer reports filed with the Commission (referred to as -09 reports). **The Department recommends that *System Data Item #17* from Xcel's IDP requirements be adopted for OTP's IDP requirements. (Recommendation 6)**

5. *System Data – Item #18*

In Xcel's IDP proceeding, the Commission approved a modification to Item #18 of the *System Data* requirements under the Baseline Distribution System and Financial Data subsection (subsection A) of the Filing Requirements section (section 3), as follows:

Total number of DER generation systems which completed interconnection to the system in the prior year, broken down by DER technology type (e.g. solar, combined solar/storage, storage, etc.)

The Department believes that this modification would also be appropriate for OTP's IDP requirements for the same reasons as listed for Item #17 in the previous section. **The Department recommends that *System Data Item #18* from Xcel's IDP requirements be adopted for OTP's IDP requirements. (Recommendation 7)**

6. *System Data – New Items*

In Xcel's IDP proceeding, the Commission approved several new filing requirements for the *System Data* requirements under the Baseline Distribution System and Financial Data subsection (subsection A) of the Filing Requirements section (section 3), as follows:

19. Total number and nameplate kW of existing DER systems interconnected to the distribution grid as of time of filing, broken down by DER technology type (e.g. solar, combined solar/storage, storage, etc.)

20. Total number and nameplate kW of queued DER systems as of time of filing, broken down by DER technology type (e.g. solar, combined solar/storage, storage, etc.)

21. Total number of electric vehicles in service territory

22. Total number and capacity of public electric vehicle charging stations
23. Number of units and MW/MWh ratings of battery storage
24. MWh saving and peak demand reductions from EE program spending in previous year
25. Amount of controllable demand (in both MW and as a percentage of system peak)

The Department supports the addition of these reporting requirements for OTP as they ensure that distribution system advancements are being tracked and considered. **The Department recommends that *System Data* Items 19-25 from Xcel's IDP requirements be adopted for OTP's IDP requirements. (Recommendation 8)**

7. Financial Data – Item #19

Item #26 for Xcel's approved IDP requirements is the equivalent, modified, version of Item #19 of OTP's draft IDP requirements. Xcel's Item #26 includes a caveat that they may provide any 2018 or earlier data in the form of their historical categorization. Currently, the Department is unaware of how OTP tracks its distribution system spending. Accordingly, **the Department requests that OTP address whether the Company is able to report distribution spending by the categories listed in Item #19, and if not, what categories of spending are currently tracked. (Request 1)**

Further, **the Department recommends that the Commission modify the first portion of Item #19 to be consistent with Item #26 of Xcel's IDP requirements (Recommendation 9)**, which states:

26. Historical distribution system spending for the past 5-years, in each category:
 - 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

8. *Financial Data – Item #21*

In Xcel's IDP proceeding, the Commission modified Item #21 (now Item #29 of Xcel's IDP requirements) of the *Financial Data* category of the Baseline Distribution System and Financial Data subsection (subsection A) of the Filing Requirements section (section 3) to explicitly include the categories referenced above in Item #19 (#26) instead of the reference to that list. The approved revised requirement states (as further modified by the Department):

Planned distribution capital projects, including drivers for the project, timeline for improvement, and summary of anticipated changes in historic spending. Driver categories should include:

- 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

The Department believes that this change is appropriate for OTP's IDP requirements as well. **The Department recommends that Item #21 of OTP's IDP filing requirements be modified to reflect the changes made to Item #21 (now Item #29) of Xcel's IDP requirements. (Recommendation 10)**

9. *Financial Data – New Items*

In Xcel's IDP proceeding, the Commission approved a new filing requirement for the *Financial Data* requirements under the Baseline Distribution System and Financial Data subsection (subsection A) of the Filing Requirements section (section 3), which states (as modified so as to pertain to OTP):

All non-Otter Tail investments in distribution system upgrades (e.g. those required as a condition of interconnection) by subset (e.g. CSG, customer-sited, PPA, and other) and location (i.e. feeder or substation)

The Department concludes that this addition would be helpful to understand the upgrades customers have financed as a condition of interconnection as a way to identify grid constraints that could be more proactively identified and met through a planning process. **The Department recommends that Item #27 of Xcel's IDP filing requirements be adopted for OTP's IDP filing requirements. (Recommendation 11)**

ii. Distributed Energy Resource Scenario Analysis

1. Item #3

In Xcel's IDP proceeding, the Commission modified Item #3 of the Distributed Energy Resource Analysis subsection (subsection C) of the Filing Requirements section (section 3), to state as follows:

Provide a discussion of the processes and tools that would be necessary to accommodate the specified levels of DER integration, including whether existing processes and tools would be sufficient. Provide a discussion of the system impacts and benefits that may arise from increased DER adoption, potential barriers to DER integration, and the types of system upgrades that may be necessary to accommodate the DER at the listed penetration levels.

Commission Staff supported CEE's proposed modifications, stating that they would provide additional clarity that was originally intended by staff for the requirement. The Department concludes that the minor modifications made in the Xcel proceeding would be appropriate for OTP's IDP as well. **The Department recommends that the Commission's modifications to Item #3 under the Distributed Energy Resource Scenario Analysis section approved for Xcel's IDP requirements be adopted for OTP's IDP requirements. (Recommendation 12)**

iii. Long-Term Distribution System Modernization and Infrastructure Investment Plan

1. Items #1 and #2

Consistent with Department Recommendation 2a, the Department recommends that Items #1 and #2 under the Long-Term Distribution System Modernization and Infrastructure Investment Plan subsection (subsection D) of the Filing Requirements section (section 3) of OTP's IDP reflect the 10-year planning horizon approved by the Commission in Xcel's IDP filing requirements instead of the 15-year planning horizon as stated in OTP's draft IDP filing requirements. **(Recommendation 2b)**

Item #1 of OTP's IDP requirements appears in a bifurcated form in Xcel's IDP requirements. The Department supports this bifurcation as a way to maintain consistency between IDP filing requirements. **The Department recommends bifurcating Item #1 after the phrase "...internal business plans and the DER future scenarios" and creating Item #2 beginning with the phrase "The 5-year Action Plan..." (Recommendation 13)**

2. *New Item*

In Xcel's IDP proceeding, the Commission approved a modification to Item #2 in Xcel's IDP requirements (the second half of Item #1 in OTP's draft IDP requirements), to state (in relevant part, and as modified to pertain to OTP):

Xcel shall provide a 5-year Action 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-wires alternative 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). Otter Tail should include specifics of the 5-year Action Plan investments. Topics that should be discussed, as appropriate, include at as a minimum:

Additionally, the Commission approved additional sub-items to the list in Item #2, as follows (modified to pertain to OTP):

- For each grid modernization project in its 5-year Action Plan, Otter Tail should provide a cost-benefit analysis.
- Status of any existing pilots or potential new opportunities for grid modernization pilots.

The Department believes these two sub-items will both hold utilities accountable for any potential grid modernization projects and require them to quantify costs and benefits, which further protects ratepayers from imprudent investments. Accordingly, and taken together, **the Department recommends that the modifications and added sub-items approved for Item #2 in section Long-Term Distribution System Modernization and Infrastructure Investment Plan from Xcel's IDP requirements be adopted for OTP's IDP requirements. (Recommendation 14)**

iv. Non-Wires Alternatives Analysis

Xcel's approved IDP altered the name of subsection E from 'Non-Wires Alternatives Analysis' to 'Non-Wires (Non-Traditional) Alternatives Analysis.' In order to maintain consistency among IDP requirements, **the Department recommends that this modification be adopted for OTP's IDP requirements. (Recommendation 15)**

1. *Item #1*

In Xcel's IDP proceeding, the Commission approved a \$2 million cost threshold in Item #1 of the Non-Wires Alternatives Analysis subsection (subsection E) of the Filing Requirements section (section 3) of Xcel's IDP. The Department believes that it is reasonable to adopt this modification for OTP's IDP as well. **The Department recommends lowering the cost threshold for non-wires alternatives review to \$2 million. (Recommendation 16)**

2. *Item #2*

Commission Staff proposed an additional sub-item to Item #2 of the Non-Wires Alternatives Analysis subsection (subsection E) of the Filing Requirements section (section 3) of Xcel's IDP requirements, which states:

A discussion of a proposed screening process to be used internally to determine that non-traditional alternatives are considered prior to distribution system investments are made.

The Department believes that this additional sub-item reinforces the intention of this section of the IDP requirements: to require consideration of non-wires alternatives. This sub-item requires the utility to discuss how non-wires/non-traditional alternatives will be screened in the nascent planning stages of a distribution system project. **The Department recommends that this additional sub-item added to the Non-Wires (Non-Traditional) Alternatives Analysis section of Xcel's IDP requirements be adopted for OTP's IDP requirements. (Recommendation 17)**

C. *TOPIC #2: Are there specific scenarios, inputs, or assumptions that Otter Tail Power should consider in its initial filing? What are reasonable medium and high scenarios (C2)?*

The Department has no specific comment on this aspect of the Notice at this time.

D. *TOPIC #3: Please address the following areas (in reference to the attached draft IDP requirements):*

a. *Are the annual or biennial filing requirements reasonable?*

The Department has no specific comment on this aspect of the Notice at this time. **The Department requests that OTP address this aspect of the IDP requirements in Reply Comments (if not addressed in Initial Comments). (Request 2)**

b. Are there additional parameters or requirements that should be part of 2. Stakeholder Meetings?

The Department has no specific comment on this aspect of the Notice at this time.

c. Should the categories under Financial Data (A19) be modified? Are there consistent categories across utilities that could be utilized?

The Department addresses this topic in the subsection titled “Financial Data – Item #19” found on pages 11 of these comments (Section II.B.2.b.i.7). See Request 1.

d. Should the Long-Term Distribution System Plan components (Section D) be on a 10-year (shorter term) outlook or a 15-year outlook (to correspond with Integrated Resource Plan timing)?

The Department addressed this topic in the subsection titled “Filing Date” found on page 8 of these comments (Section II.B.2.a). See Recommendations 2a and 2b.

E. TOPIC #4: Are there other issues or concerns related to this matter?

The Department has no specific comment on this aspect of the Notice at this time.

III. CONCLUSION AND SUMMARY OF RECOMMENDATIONS

The Department appreciates the opportunity to comment on the Commission’s Notice on draft IDP requirements for OTP.

Below is a table that summarizes the Department’s requests and recommendations.

Recommendation / Request	Related To	Text of Recommendation	Page(s)
Recommendation 1	Planning Objectives	The Department recommends that the <i>Planning Objectives</i> approved in Xcel’s IDP proceeding be adopted for OTP’s IDP requirements, modified as appropriate.	6
Recommendation 2a	Planning Horizon	The Department recommends that OTP’s IDP reflect a 10-year planning horizon requirement.	6
Recommendation 3	Requirement 3(A)(7)	The Department recommends that <i>System Data</i> Item #7 from the Filing Requirements section of Xcel’s IDP requirements be adopted for OTP’s IDP requirements.	7

Recommendation 4	Requirement 3(A)(15)	The Department recommends that <i>System Data</i> Item #17 from the Filing Requirements section of Xcel's IDP requirements be adopted for OTP's IDP requirements.	7
Recommendation 5	Requirement 3(A)(16)	The Department recommends that <i>System Data</i> Item #16 from Xcel's IDP requirements be adopted for OTP's IDP requirements.	7
Recommendation 6	Requirement 3(A)(17)	The Department recommends that <i>System Data</i> Item #17 from Xcel's IDP requirements be adopted for OTP's IDP requirements.	8
Recommendation 7	Requirement 3(A)(18)	The Department recommends that <i>System Data</i> Item #18 from Xcel's IDP requirements be adopted for OTP's IDP requirements.	8
Recommendation 8	New 3(A) Requirements	The Department recommends that <i>System Data</i> Items 19-25 from Xcel's IDP be adopted for OTP's IDP.	9
Request 1	Requirement 3(A)(19)	The Department requests that OTP address whether the Company is able to report distribution spending by the categories listed in Item #19, and if not, what categories of spending are currently tracked.	9
Recommendation 9	Requirement 3(A)(19)	The Department recommends that the language of the first portion of Item #26 of Xcel's IDP requirements (Item #19 of OTP's IDP requirements) be adopted for OTP.	9
Recommendation 10	Requirement 3(A)(21)	The Department recommends that Item #21 of OTP's IDP filing requirements be modified to reflect the changes made to Item #29 of Xcel's IDP requirements.	10
Recommendation 11	New 3(A) Requirement	The Department recommends that Item #27 of Xcel's IDP filing requirements be adopted for OTP's filing requirements.	10
Recommendation 12	Requirement 3(C)(3)	The Department recommends that the modifications to Item #3 under the Distributed Energy Resource Scenario Analysis section approved for Xcel's IDP requirements be adopted for OTP's IDP requirements.	11
Recommendation 2b	Requirement 3(D)(1) and (2)	The Department recommends that references to a 15-year planning horizon in the Long-Term Distribution System Modernization and Infrastructure Investment Plan subsection (subsection 3(D) of OTP's filing requirements) be replaced with a 10-year planning horizon.	11
Recommendation 13	Requirement 3(D)(1) and (2)	The Department recommends bifurcating Item #1 after the phrase "...internal business plans and the DER future scenarios" and creating Item #2 beginning with the phrase "The 5-year Action Plan...".	11
Recommendation 14	Requirement 3(D)(1)	The Department recommends that the modifications and added sub-items approved for Item #2 in section Long-Term Distribution System Modernization and	12

		Infrastructure Investment Plan from Xcel's IDP requirements be adopted for OTP's filing requirements.	
Recommendation 15	Requirement 3(E)	The Department recommends that the title of section 3(E) be renamed 'Non-Wires (Non-Traditional) Alternatives Analysis.'	12
Recommendation 16	Requirement 3(E)(1)	The Department recommends lowering the cost threshold for non-wires alternatives review to \$2 million.	13
Recommendation 17	Requirement 3(E)(2)	The Department recommends that the additional sub-item added to the Non-Wires (Non-Traditional) Alternatives Analysis section of Xcel's IDP requirements be adopted for OTP's IDP requirements.	13
Request 2	Notice Topic 3(a)	The Department requests that OTP address whether an annual or biennial filing requirement is reasonable.	13

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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. E017/CI-18-253

Dated this 7th day of September 2018

/s/Sharon Ferguson

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