

Revised Decision Options

Xcel Energy Integrated Distribution Plan, Docket E002/M-23-452

- Xcel, Fresh Energy, the Department, the OAG, GEC, and CEG sent preferred decision options. Where there are changes from the initial briefing papers in support Staff has noted it in (red underline)
- New/revised decision options are also included in red underline and prefaced by the organization sponsoring them, for example “OAG 45”
- Staff has listed where participants are opposed to a decision option. If a non-utility participant is not listed under support or oppose, they took no position on the issue. In some instances, Staff has provided additional context when a participant took no position.
- Submissions received by participants are attached to the end of the revised decision options and contain additional context on participant preferences.

Summary of Positions

DO	Xcel	Department	Fresh Energy	GEC	OAG, CEG, Mpls, CEEM
1	Support	Oppose	Support	Support	Mpls Support
2	Oppose	Support	No Position	Oppose	CEEM Support
3	Oppose	Oppose	Oppose	Oppose	CEEM Support
4	Support	Support	Support	Support	No Position
5	Oppose	Support	Support	Support	CEEM Support
6	Oppose	Support	Support	Support	No Position
7	No Position	Support	Support	Support	No Position
8	Oppose	Support	Support	Support	No Position
9	Oppose	Support	Oppose	Support	No Position
10	Oppose	Support	Support	Support	No Position
11	Oppose	Support	No Position	No Position	No Position
12	Oppose	Oppose	Oppose	No Position	Mpls Support
13	Support	Support	Support	No Position	No Position
14	Support	See DOC 15	Oppose	Oppose	No Position
15	No Position	See DOC 15	Support	Support	No Position
DOC 15	No Position	Support	No Position	No Position	No Position
16	Oppose	Support	No Position	No Position	No Position
17	No Position	Oppose	Support	Support	CEG Support
18	Oppose	Support	Oppose	No Position	No Position
19	Oppose	Support	Oppose	No Position	No Position
20	No Position	Oppose	Support	No Position	No Position
21	No Position	Support	No Position	Support	No Position
22	Oppose	Support	No Position	Support	No Position

DO	Xcel	Department	Fresh Energy	GEC	OAG, CEG, Mpls, CEEM
23	Oppose	Support	No Position	Support	OAG Support
24	Oppose	Support	Support	Support	No Position
25	Oppose	Oppose	No Position	Support	No Position
26	Oppose	Support	No Position	No Position	No Position
27	Support	Support	Support	Support	No Position
28	No Position	Support	Support	Support	No Position
29	Oppose	Support	Support	Support	CEEM Support
30	Oppose	Support	Support	Support	CEEM, Mpls Support
31	Oppose	Support	No Position	No Position	No Position
32	Oppose	Oppose	No Position	No Position	No Position
33	Oppose	Support	Support	Support	No Position
34	No Position	Support	Support	Support	OAG, CEG Support
35	No Position	Oppose	Prefers 34	Prefers 32	No Position
36	Oppose	Support	No Position	Support	CEEM Support
37	Oppose	Oppose	Oppose	Support	No Position
38	Oppose	Oppose	Oppose	Support	No Position
39	Oppose	Support	Oppose	Support	No Position
40	Oppose	Support	Oppose	Support	CEEM Support
41	Oppose	Support	Support	Support	OAG Support
42	Support	Oppose	Support	No Position	CEG Support
43	Support	Support	Prefers 42	No Position	CEG prefers 42
44	Oppose	Oppose	Oppose	No Position	CEG Opposes
45	No Position	Support	Support	Support	No Position
OAG 45	No Position	No Position	No Position	No Position	OAG Support
46	Oppose	Support	No Position	No Position	No Position
47	Oppose	Oppose	Oppose	No Position	No Position
48	Support	Support	Oppose	Oppose	No Position
49	Oppose	Oppose	Support	Support	Mpls Support
50	No Position	Support	Oppose	Oppose	No Position
51	No Position	Oppose	Support	Support	No Position
52	Oppose	Support	Support	Support	CEEM Support
53	No Position	Support	Support	Support	CEEM Support
54	Oppose	Support	Support	Support	Mpls Support
55	Oppose	Support	Support	Support	CEEM, Mpls Support
56	Oppose	Support	Support	Support	CEEM Support
56a	Oppose	No Position	Prefers 56b	Support	No Position
56b	Oppose	No Position	Support	Prefers 56a	No Position

DO	Xcel	Department	Fresh Energy	GEC	OAG, CEG, Mpls, CEEM
56c	Oppose	Support	Support	Support	No Position
57	Oppose	Support	Oppose	No Position	Mpls Support
58	No Position	Support	Support	Support	No Position
59	Oppose	Support	No Position	No Position	No Position
60	Oppose	Oppose	Support	Support	No Position
61	Oppose	Support	No Position	No Position	Mpls Support
62	No Position	Support	No Position	No Position	No Position
63	Oppose	No Position	No Position	Support	No Position
64	Oppose	No Position	No Position	No Position	CEEM Support
65	Oppose	No Position	No Position	Support	CEEM Support
66	Oppose	No Position	No Position	No Position	CEEM Support
67	Oppose	Support	Support	Support	Mpls Support
68	Oppose	Oppose	Oppose	No Position	No Position
69	Oppose	Oppose	No Position	No Position	Mpls Support
70	No Position	Support	Support	Support	No Position

Decision Options

General

The Commission must select DO 1, 2, or 3. It may select DO 4.

1. Accept Xcel Energy's 2023 IDP Report as in compliance with IDP reporting requirements. Acceptance of the 2023 IDP has no bearing on prudence nor certification under Minn. Stat. § 216B.2425, subd. 3. (Xcel, Fresh Energy, GEC, Minneapolis)
Opposed: Department

OR

2. Accept Xcel Energy's 2023 IDP report as in compliance with IDP reporting requirements contingent on the Company making additional filings as noted below. Acceptance of the 2023 IDP has no bearing on prudence nor certification under Minn. Stat. § 216B.2425, subd. 3. (Department)
 - a. Find Xcel has not complied with Filing Requirement 3.D.2 and require Xcel to file an amended Appendix C of its IDP to include all required information on grid modernization, including cost-benefit analyses of near-term projects.
(Department, CEEM)
Opposed: GEC, Xcel

OR

3. Do not accept Xcel Energy's 2023 IDP. (CEEM)
Opposed: Fresh Energy, GEC, Xcel
4. Require Xcel Energy to report all DERs and DER forecasts in MW_{ac} in future IDPs. (Staff, [Fresh Energy](#), [GEC](#), [Xcel](#), [Department](#))

Load and DER Forecast

The Commission may select any combination of Decision Options 5 through 12, or none of the options.

5. In future forecasts, require Xcel: (1) to address any impacts from changes in rate design, in particular the use of time-of-use (TOU) rates, on its IDP forecasts and resulting investment planning; and (2) to continue to refine its incorporation of demand response and load flexibility programs into its forecasts in a more granular manner. (GEC, CEEM, [Fresh Energy](#), [Department](#))
Opposed: Xcel
6. Require Xcel to develop plans to expand load flexibility pilots such that residential customers can opt to participate and be compensated for their load flexibility, taking into consideration recommendations related to their impact on the local distribution system. (GEC, [Fresh Energy](#), [Department](#))
Opposed: Xcel

7. In its next IDP, Xcel shall report on its progress to improve forecasting, including:
 - a. Refining its residential beneficial electrification forecasts to include low, medium, and high adoption scenarios.
 - b. Presenting an initial C&I beneficial electrification forecast, or if the Company is unable to complete one by that time, the Company shall explain why not and include a detailed explanation of how it is thinking about this forecast, information challenges it raises, and approaches Xcel is considering.
 - c. Evaluating the accuracy of LoadSEER forecasts.
 - d. Utilizing IDP forecast scenarios to perform sensitivities on grid capacity or capital expense plans.

(Fresh Energy, [GEC](#), [Department](#))

Xcel took no position

8. In future IDPs require Xcel Energy to provide standalone forecasts for demand response, load flexibility, and energy efficiency. (Staff, [Fresh Energy](#), [GEC](#), [Department](#))

Opposed: Xcel

9. Require Xcel to provide in the next IDP for one of the LoadSEER forecasts:
 - a. a complete list of the data sets used in making the LoadSEER forecast, including:
 - i. a brief description of each data set and
 - ii. an explanation of how each was obtained, (e.g., monthly observations, billing data, consumer survey, etc.) or a citation to the source (e.g., population projection from the state demographer);
 - b. a clear identification of any adjustments made to raw data to adapt them for use in the LoadSEER forecast, including:
 - i. the nature of the adjustment,
 - ii. the reason for the adjustment, and
 - iii. the magnitude of the adjustment;
 - c. a discussion of each essential assumption made in preparing the LoadSEER forecast, including:
 - i. the need for the assumption,
 - ii. the nature of the assumption, and
 - iii. the sensitivity of forecast results to variations in the essential assumptions;
 - d. an equation showing the LoadSEER forecast model:
 - i. for example, $\text{Peak} = a + b1 * \text{Economic Variable} + b2 * \text{CDD/day} \dots$
 - e. information documenting the LoadSEER forecast's confidence levels including statistical accuracy of the individual variables and overall model=; and
 - f. the outputs from the LoadSEER forecast.

(Department, [GEC](#))

Opposed: Fresh Energy, Xcel

10. Require Xcel to provide a comparison of the forecast provided in the IDP to actuals in its next IDP. (Department, Fresh Energy, GEC)
Opposed: Xcel
11. Order Xcel to adopt a forecast method that is reviewable by the Department and other parties for the Company's next IDP. (Department)
Opposed: Xcel
12. Require Xcel to double the adoption rate assumptions for electric vehicles and rooftop solar in its next IDP to account for IRA funding. (Minneapolis)
Opposed: Fresh Energy, Xcel, Department

Filing Requirement Modifications

The Commission may select Decision Option 13.

13. Modify Xcel Energy's IDP filing requirements to discontinue requirement 3.A.9. (Xcel, Department, Fresh Energy)

The Commission may select Decision Option 14, 15, DOC 15, or none of the options. These decision options are explained the Joint Briefing Papers.

14. Modify Xcel Energy's IDP filing requirements to amend requirement 3.A.26, 3.A.28, and 3.A.29 to remove the requirement that financial information be reported in IDP-specific categories as follows: (Xcel, Department – prefers DOC 15)
Opposed: Fresh Energy, GEC

- 3.A.26 Historical distribution system spending for the past 5 years, ~~in each category. Information shall be reflected in categories consistent with the Company's cost recovery proceedings.~~
 - ~~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~~
 - ~~i. Electric Vehicle Programs~~
 - ~~1) Capital Costs~~
 - ~~2) O&M Costs~~
 - ~~3) Marketing and Communications~~
 - ~~4) Other (provide explanation of what is in "other")~~

~~The Company may provide in the IDP any 2018 or earlier data in the following rate case categories:~~

- ~~a. Asset Health~~
- ~~b. New Business~~
- ~~c. Capacity~~
- ~~d. Fleet, Tools, and Equipment~~
- ~~e. Grid Modernization~~

For each category, provide a description of what items and investments are included.

3.A.28 Projected distribution system spending for 5 years into the future ~~for the categories listed above in categories consistent with the Company's cost recovery proceedings. itemizing any non-traditional distribution projects.~~

3.A.29 Planned distribution capital projects, including drivers for the project, timeline for improvement, summary of anticipated changes in historic spending. Projects shall be reflected in categories consistent with the Company's cost recovery proceedings. ~~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~~
- ~~i. Electric Vehicle Programs~~
 - ~~1) Capital Costs~~
 - ~~2) O&M Costs~~
 - ~~3) Marketing and Communications~~
 - ~~4) Other (provide explanation of what is in "other")~~

OR

15. Delegate authority to the Executive Secretary to work with Xcel Energy and stakeholders on ways to modify the IDP budget categories to allow for comparisons between utilities and comparison of historic to forecasted data. Delegate authority to the Executive Secretary to approve via notice a stakeholder agreement on amended filing requirements if one is reached. (Staff, Fresh Energy, GEC)

Opposed: Department (prefers DOC 15)

Xcel took no position

DOC 15 Require Xcel Energy to file both the IDP budget categories and the categories of the Company's cost recovery proceedings in its 2025 IDP. (Staff interpretation of Department alternative to DO 1 and 2)

The Commission may select Decision Option 16 or 17, or neither. These decision options are explained the Joint Briefing Papers.

16. Adopt a new IDP filing requirement requiring Xcel to specifically address how beneficial electrification is anticipated to affect the distribution grid and cost allocation issues thereof. (Department)

Opposed: Xcel

OR

17. Delegate Authority to the Executive Secretary to work with Xcel, the Department, and stakeholders to modify the IDP filing requirements to include discussions of the impacts of electrification where appropriate. Delegate authority to the Executive Secretary to approve via notice a stakeholder agreement on amended filing requirements if one is reached. (Staff, [Fresh Energy](#), [GEC](#), [CEG](#))

Opposed: Department

Xcel took no position

Resiliency

The Commission may select Decision Option 18. This decision option is explained the Joint Briefing Papers.

18. Direct Xcel to develop a suite of metrics to track resiliency, including SAIDI and SAIFI including MEDs, and other metrics to the extent warranted in its 2024 IDP Annual Compliance filing. (Department)

Opposed: Fresh Energy, Xcel

The Commission may select Decision Option 19 or 20 or neither.

19. Require Xcel to propose a set of resiliency performance metrics such as Sandia's that encompass broad system impacts, in addition to SAIDI and SAIFI its 2024 IDP Annual Compliance filing. (Department)

Opposed: Fresh Energy, Xcel

OR

20. Require Xcel Energy to provide a discussion of how it tracks and considers the restoration of critical customer load, such as hospitals and first responder sites during extended outage events in its next IDP. (Staff, [Fresh Energy](#))

Opposed: Department

Xcel took no position

Equity and Energy Justice

The Commission may select any combination of Decision Options 21 through 23, or none of the options.

Staff has slightly modified DO 21 to preserve process flexibility for the Commission given the upcoming July 9, 2024 stakeholder meeting that will discuss related topics.

21. Authorize the Executive Secretary to open a docket or a comment period in an existing docket to study and consider (1) racial disparities in involuntary disconnections and (2) whether the Commission should institute a moratorium on some or all utility-service disconnections by Xcel until Xcel develops a robust set of measures to eliminate racial disparities in disconnections. (Staff modification of GEC, Department)

Fresh Energy changed to no position as it believes this will be addressed in the July 9 meeting. Xcel took no position

22. Reject Xcel's recommendation to isolate consideration of the disparities identified by the Xcel Equity Analysis and the Chan/Pradhan analysis in the SRSQ Docket and affirm that the IDP is the appropriate forum to evaluate and discuss distribution planning solutions to address these inequities. (GEC, Department)

Opposed: Xcel

Fresh Energy noted support but not at the exclusion of discussion on disconnections in SRSQ and other relevant dockets

Staff does not oppose the reporting requirements listed in Decision Option 23, but notes that if the Commission is opening a new docket or Comment period with DO 21 above that may be a more appropriate place to report the disconnection related metrics in subparts b and c. Having an identified existing or new docket specifically addressing issues of disconnections and affordability could give greater focus on these key issues rather than adding to the already large amount of information present in the IDP, where Staff is concerned it could get lost. Staff preference would be to remove the references to disconnection reporting and consider those in Docket 24-27.

23. In addition to the reporting in its service quality reports and locational reliability map, require Xcel to:
 - a. Report in its 2025 IDP the CELI-12 in neighborhoods where analysis by both the Pradhan and Chan Report and the Company has shown a "strong relationship" between CELI-12 and race when the neighborhood has both a high proportion of people of color and older housing stock.
 - b. Report in its 2025 IDP the level of disconnections in neighborhoods where analysis by both the Pradhan and Chan Report and the Company has shown "the number of disconnections is higher in identified lower-income areas and increases when the proportion of people of color increases within an income group."
 - c. Describe in its 2025 IDP the steps the Company is taking to reduce and eliminate the racial disparities seen in CELI-12 and disconnections in these neighborhoods. Xcel shall recalculate racial disparities as part of this reporting to identify the level of improvement over time.

(~~Fresh Energy~~, OAG, GEC, Department)

Opposed: Xcel

Fresh Energy changed to no position as it believes this will be addressed in the July 9 meeting.

Distribution Budget

The Commission may select any combination of Decision Options 24 through 26, or none of the options.

24. Require Xcel to incorporate both hosting capacity and equity considerations into its distribution budget prioritization process. (GEC, [Fresh Energy](#), [Department](#))
Opposed: Xcel
25. Reaffirm that the Commission will rely on the IDP when reviewing utility distribution investments in rate cases, and that if a rate case proposal is inconsistent with the utility's IDP, then the bar for Commission approval is significantly higher. (GEC)
Opposed: Xcel, Department
26. Require Xcel to separate the total "program" and "project" budgets into discrete programs and projects for all Budget Categories in Attachment H, Capital Project List by IDP Category, to the fullest extent possible. (Department)
Opposed: Xcel

Cost Benefit Analysis for Discretionary Investments

The Commission may select any combination of Decision Options 27 through 30, or none of the options.

27. Require Xcel Energy to engage in additional stakeholder discussions on approaches to apply CBAs, or a similar type of evaluation, strategically to program-level investments for discretionary projects. (Xcel, Fresh Energy, GEC, [Department](#))
28. In its next IDP, require Xcel to include a discussion of the results of stakeholder conversations about ways to conduct program-level cost benefit analyses for relevant discretionary distribution expenditures. (Fresh Energy, GEC, [Department](#))
Xcel took no position
29. As part of the stakeholder effort, require Xcel to explain how it would define "discretionary" spending in this context and to explain its cost-benefit methodology, including specifically its identification of benefits. (GEC, CEEM, [Fresh Energy](#), [Department](#))
Opposed: Xcel
30. Clarify that Xcel must evaluate applying cost-benefit analyses to program-level investments. (GEC, CEEM, Minneapolis, [Fresh Energy](#), [Department](#))
Opposed: Xcel
Fresh Energy noted support but believed it was already captured under 27.

*The Commission may select DO 31 **AND/OR** 32, **OR** DO 33, or none of the options. These decision options are explained the Joint Briefing Papers.*

31. Direct Xcel to provide a proposal for reporting on the expected benefits and costs of elective distribution grid investments in its next IDP. This proposal shall specifically address the following:
- What is the definition of an elective distribution grid investment?
 - What cost threshold, if any, should apply to reporting on the expected benefits and costs of elective distribution grid investments in the IDP?
 - For which metrics will Xcel report expected results for its elective distribution grid investments?
 - For which metrics does Xcel propose that it be required to report results on an ongoing basis for its elective distribution grid investments?

(Department)

Opposed: Xcel

Fresh Energy took no position but expected this would be discussed in the stakeholder process in DO 27

AND/OR

32. Direct Xcel to provide a proposal for measuring the capacity, reliability, ratepayer, and equity impacts of its distribution grid investments in its next IDP. This proposal shall specifically address the level of granularity at which Xcel will evaluate these impacts for each budget category, indicating for each category whether Xcel plans to measure these impacts at the level of the budget category, program, project, or at some other level of resolution, or not at all, and specifically accounting for the impact of any expected changes to IDP budget categories. (~~Department~~ – now supports DO 33)

Opposed: Xcel

OR

33. Delegate authority to the Executive Secretary work with Xcel Energy and stakeholders to discuss metrics reported across distribution dockets and delegate authority to the Executive Secretary to approve via notice a stakeholder agreement on metrics reporting if one is reached. At minimum, the proposal and metrics should include the following components:
- Reliability metrics such as SAIDI, SAIFI, CAIDI, CEMI, and CELI
 - Distribution spending by IDP budget categories
 - Whether there is available hosting capacity for generation or load at the primary system level
 - Demographic data including race and income
 - Installed DERs, ECO rebates, DR customers enrolled in programs
 - Metrics reported at a feeder and/or census block group level

(Staff, Fresh Energy, GEC, Department)

Opposed: Xcel

GEC also suggested it may be appropriate to discuss proposals related to resiliency metrics (DOs 18-20) within this effort.

Proactive Grid Upgrades and Cost Allocation

The Commission may Decision Options 34 or 35, or neither option.

34. Delegate authority to the Executive Secretary to establish a stakeholder process to develop a framework on cost allocation and proactive upgrades for Xcel Energy. The stakeholder workgroup may also include Dakota Electric Association, Minnesota Power, and Otter Tail Power if they wish to participate. The Commission sets the following guidelines for the process:
- a. The goal of the workgroup is to develop proposals for proactive upgrades and cost allocation for Commission consideration and possible adoption.
 - b. The process does not need to reach consensus but should aim to clearly identify areas of agreement and disagreement to facilitate a Commission decision.
 - c. The Commission establishes a goal of completing the stakeholder process by [insert date]. At the conclusion of the process there will be a notice and comment period on any proposals followed by a Commission decision.
 - d. Proposals should address, at minimum, the following topics:
 - i. How to allocate the costs of proactive upgrades
 - ii. How to ensure any proactive upgrades are distributed in an equitable manner throughout a utility's service territory
 - iii. If costs are socialized among ratepayers, whether portions of the upgraded capacity should be reserved for certain customer classes
 - iv. How a proactive upgrade program would integrate with a utility's planned distribution investment programs
 - v. How a utility's other capacity programs and changes to distribution standards impact available hosting capacity
 - vi. How to determine where and when there is a need for proactive upgrades using forecasted DER and load adoption
 - vii. Whether there should be changes to any of a utility's service policy provisions such as Contributions In Aid of Construction (CIAC).

(Staff, OAG, Fresh Energy, GEC, CEG, Department)

Xcel took no position

35. Require Xcel to host two workshops to advance a framework on DER cost allocation and proactive upgrades. The workshops shall include proposals from stakeholders as well as a proposal from Xcel recommending a path forward. Parties will file meeting materials in this docket, and Xcel must include summaries of stakeholder proposals and stakeholder questions in its next IDP, along with a discussion of its own framework or proposal.

(Fresh Energy)

Opposed: Department

Fresh Energy noted it now prefers DO 34.

GEC noted it supports DO 35 if the Commission does not adopt DO 34

Xcel took no position

The Commission may select any combination of Decision Options 36 through 41, or none of the options. Staff notes DOs 37 and 38 could be included in the stakeholder process describe in DO 34, and agrees with Fresh Energy that DO 39 will be included in the discussion on the new interconnection legislation, which could be included as part of DO 34.

36. For its Grid Reinforcements Program, require Xcel to report on actual upgrades undertaken under this budget in its upcoming IDPs, such that the Commission and stakeholders can evaluate its deployment. (GEC, CEEM, [Department](#))

Opposed: Xcel

37. For its placeholder budget for proactive hosting capacity upgrades, require Xcel to:
 (1) target areas serving all or primarily residential and small commercial customers; and
 (2) consider the energy justice implications of its proactive grid investments, including specifically evaluating whether it can target upgrades to improve capacity for new load or hosting capacity within “environmental justice areas” where it has identified relatively low or constrained capacity. (GEC)

Opposed: Xcel, Department, Fresh Energy (believes it will be addressed in stakeholder process under DO 34)

GEC would also support inclusion of these goals in the stakeholder process under DO 34

38. Require Xcel to consider socializing the costs of such proactive hosting capacity upgrades, targeted to residential and small commercial customers, similar to the treatment of small customer load. (GEC)

Opposed: Xcel, Department, Fresh Energy (believes it will be addressed in stakeholder process under DO 34)

GEC would also support inclusion of these goals in the stakeholder process under DO 34

39. Require Xcel to provide options, if any, to help distribute costs to interconnect a small residential facility on a saturated feeder including whether a flat interconnection fee, similar to the small solar array fee, has been considered for larger facilities in its 2024 IDP Annual Compliance filing. (Department, [GEC](#))

Opposed: Xcel, Fresh Energy (believes it will be addressed in stakeholder process prompted by new interconnection legislation)

GEC would also support inclusion of these goals in the stakeholder process under DO 34

40. Require Xcel to explain the scale and scope of DERs it expects to serve with the \$190 million placeholders in its next IDP. (CEEM, , [Department](#), [GEC – if Xcel includes the placeholder in a request for cost recovery](#))

Opposed: Xcel, Fresh Energy

41. Direct Xcel not to include funds for proactive grid upgrades, such as the Grid Reinforcement Program or the Proactive System Upgrades to Increase Hosting Capacity in its rate case until the Commission has adopted a framework on cost allocation and proactive upgrades. (Staff, [OAG](#), [Fresh Energy – support on hosting capacity, no position on Grid Reinforcement](#), [GEC](#), [Department](#))

Opposed: Xcel

CIAC Waiver

The Commission should select Decision Option 42, 43, or 44. If it selects Decision Option 42 or 43, it may also select 45.

42. Approve Xcel Energy's proposed tariff changes waiving CIAC for certain EV customers as outlined in Xcel's June 12, 2024 Letter. (Xcel, [Fresh Energy](#), [CEG](#))
Opposed: Department (prefers 43)

OR

43. Delegate authority to the Executive Secretary to approve the tariff changes outlined in Xcel's June 12, 2024 Letter via notice if no objections are filed within 30 days of the Commission's Order. (Staff, [Xcel \(prefers 42\)](#), [Department](#))
Opposed: Fresh Energy (prefers DO 42)
CEG prefers DO 42 but is not opposed

OR

44. Deny Xcel's proposed CIAC waiver for certain EV customers. (OAG)
Opposed: Xcel, Fresh Energy, CEG, Department

45. Require Xcel to track and report on the amount of each CIAC waiver granted to residential customers and the revenues foregone as a result of the waiver and file the data in its Annual EV Reports due June 1 annually. Require Xcel to report the aggregate number and dollar amount of waivers starting with its 2025 IDP. (Staff modification of OAG and CEG, [Fresh Energy](#), [GEC](#), [CEG](#), [Department](#))
Xcel took no position

OAG 45 Require Xcel to track the following information for each CIAC waiver granted to a residential EV customer:

- a. A brief description of the upgrade;
- b. The total cost of the upgrade;
- c. The amount of CIAC waived;
- d. The customer's rate code; and
- e. The customer's census block group.

Require Xcel to include this information in its annual EV reports for the most recent 12-month period. Require Xcel to report the aggregate number and dollar amount of waivers starting with its 2025 IDP. (OAG)

Grid Modernization

The Commission may select any combination of Decision Options 46 and 47, or neither option.

46. Require Xcel to comply with additional grid modernization filing requirements established by the Commission in its July 17, 2023 Order in Docket E002/GR-21-630 by providing a roadmap of planned and contemplated future grid modernization investments and a complete accounting of all historical grid modernization costs and all anticipated future grid modernization costs with its IDP. (Department)

Opposed: Xcel

47. Delegate authority to the Executive Secretary to (1) expand the scope of the Distributed Generated Working Group (DGWG) or (2) create a new working group to address grid modernization issues. (~~Department~~)

Opposed: Xcel, Fresh Energy to expansion of DGWG, Department – Covered by other processes

Planned Net Load Methodology

The Commission should select Decision Options 48 or 49.

48. Determine the Company's Planned Net Load methodology is reasonable. (Department, Xcel)

Opposed: Fresh Energy, GEC

OR

49. Require Xcel to refine its PNL methodology by increasing the PV dependability factor for summer-peaking areas. Xcel shall also evaluate alternative approaches to applying the dependability factor, including applying it to hourly PV generation and to PV nameplate capacity. Xcel shall engage parties that commented on PNL in this proceeding as it evaluates seasonal dependability factors and alternative PNL approaches. Xcel shall include a report describing the results of this evaluation and changes to its proposed PNL methodology in its next IDP. (Fresh Energy, Minneapolis, GEC)

Opposed: Xcel, Department

The Commission should select Decision Options 50 or 51.

50. Do not require Xcel to implement the 15 percent DF_{PV} in the next planning cycle for N-0 risk analysis in the next IDP. (Department, ~~Xcel~~)

Opposed: Fresh Energy, GEC

Xcel changed to take no position

OR

51. Require Xcel to implement the 15 percent DFPV in the next planning cycle for N-0 risk analysis in the next IDP. (Staff, Fresh Energy, GEC)

Opposed: Department

Xcel took no position

DERMS and Flexible Interconnection

The Commission may adopt any combination of Decision Options 52 through 56, or none of the options.

52. Require Xcel to demonstrate the Company's ability to integrate DERs with the tools available to it today and in the near term, including specifically through: (GEC, Department, CEEM, Fresh Energy)
- a. Implementing static Flexible Interconnection prior to implementing full, dynamic Flexible Interconnection; and
 - b. Pursuing a staged approach to Flexible Interconnection, DERMS, and Dynamic Hosting Capacity implementation.

Opposed: Xcel

53. Require Xcel to be transparent about the conditions under which the Company will use Flexible Interconnection, particularly with impacted DER owner/operators. (GEC, Department, CEEM, [Fresh Energy](#))

Xcel took no position

54. Direct the DGWG to take up the topic of Flexible Interconnection to work through questions related to Static Flexible Interconnection as well as Dynamic Flexible Interconnection which is enabled by DERMS. (GEC, Minneapolis, [Fresh Energy](#), [Department](#))

Opposed: Xcel

55. Require Xcel to conduct robust stakeholder outreach, including specifically with DER owners/operators, and describe in a filing with the Commission its stakeholder engagement process, the materials it used to inform stakeholders about DERMS (addressing, e.g., costs, benefits, alternatives, purpose, problems it is solving), the feedback it received, and how it has addressed it. The filing shall be filed in Xcel's 2025 IDP, or at the time of request for certification or cost recovery for any DERMS investments, whichever is sooner. (GEC, Department, CEEM, Fresh Energy)

Opposed: Xcel

56. Require Xcel to file a detailed roadmap for DERMS deployment that addresses the questions provided in subpart c. Xcel must adequately address these questions before any DERMS investments will be approved. The roadmap and answered questions shall be filed: (GEC, Department, CEEM, Fresh Energy)
- a. In Xcel's 2025 IDP, or at the time of request for certification or cost recovery for any DERMS investments, whichever is sooner. (~~Fresh Energy~~, [GEC - preferred](#))
 - b. Prior to Commission approval and Company implementation of any DERMS investments. (GEC ~~– second choice~~, [Fresh Energy](#))
 - c. Questions to consider:
 - i. What are the alternatives to DERMS?
 - ii. What are the specific use cases for which DERMS will be utilized and who are the intended beneficiaries?

- iii. Will participation in DER Management be voluntary or required? Will requirements vary based on resource size, resource type, program participation, market participation, or other factors? Will it be available for load interconnections (e.g., EV charging hubs) or interconnections utilizing limited import/export control systems?
- iv. How will communications be established between Xcel's DERMS and customer DER? Who will bear the ongoing cost for any necessary communications infrastructure?
- v. How will capacity be allocated across new and existing managed and unmanaged interconnectors? How will capacity upgrades be justified and from whom will upgrade costs be recovered?
- vi. How will prospective applicants understand the impact of DER management on the economics of their project? What information will be provided to prospective interconnectors related to expected curtailment and existing and expected grid conditions?
- vii. What are the expected deployment and integrations costs for DERMS? What is the expected ongoing licensing, operating, and infrastructure costs to execute and maintain DERMS functionality? From whom will these costs be recovered?
- viii. How are equity and energy justice principles being incorporated within the use cases, process design, and cost allocation?

Opposed: Xcel

The Commission may adopt Decision Option 56 and/or 57, or neither option.

57. Address the DERMS use cases and implementation, and potentially other cross-proceeding and cross-utility issues, such as cost allocation through: (~~GEC~~, Minneapolis, Department – Supports A)

- a. The DGWG after first expanding the workgroup's scope and changing its name

OR

- b. The creation of a separate Commission-led working group dedicated to the topic of DERMS and its related investments

Opposed: Xcel, Fresh Energy

GEC changed to "no position" based on other stakeholder engagement proposals and Staff's concern about DGWG workload.

58. Require that any working group efforts on DERMS and Flexible Interconnection are facilitated by a neutral party, such as a Commission-led working group, and are otherwise consistent with the GECs' general stakeholder engagement recommendations. (GEC, Fresh Energy, Department)

Xcel took no position

Distributed Intelligence (DI)

The Commission may select Decision Option 59, or not.

59. Require Xcel file an amended proposal for DI [in this docket] with a complete cost-benefit analysis demonstrating that DI is cost-effective. If the Xcel cannot demonstrate cost-effectiveness on narrow quantitative grounds, then it must provide justification for why it believes that the costs of DI should be allowed for recovery. Require Xcel to make the filing within [180 days] of the Commission's order in this docket. (Department)

Opposed: Xcel

Integrated Volt Var Optimization (IVVO)

The Commission may adopt Decision Option 60 or 61, or neither option.

60. Require Xcel to re-evaluate IVVO for its Minnesota service area (applying the new Minnesota Test for cost-effectiveness and updated assumptions informed by PSCo's experience with IVVO). As part of this analysis, Xcel shall identify feeders where IVVO is most cost-effective, discuss the potential for targeted deployment to these areas and/or in under-resourced communities, and report on its updated evaluation within 6 months of the Commission's Order in this proceeding in the current docket. (Fresh Energy, GEC)

Opposed: Xcel, Department

61. Direct Xcel Energy to identify feeders for which IVVO is cost-effective, using the new Minnesota Test and updated assumptions informed by the experience Colorado affiliate (Public Service Company) with IVVO and the Company's forecasts for EV adoption, building electrification, and distributed generation adoption in its 2024 IDP Annual Compliance filing. (Department, Minneapolis)

Opposed: Xcel

Fault Location, Isolation, and Service Restoration (FLISR)

The Commission may select Decision Option 59, or not.

62. Require Xcel to include a report of reliability performance for circuits equipped with FLISR, consistent with the Department's recommendations in Docket E002/GR-21-630. (Department)

Xcel took no position

Technical Planning Standard

63. Require Xcel to answer the following questions in its next IDP: (1) Which IDP projects and programs are impacted by the TPS, such that the associated investments are higher than they would be without the TPS?; and (2) Is it just and reasonable to allow full cost recovery of investments that are inflated by application of the TPS? (GEC)

Opposed: Xcel

64. Require Xcel to explain whether energy storage was considered by Xcel as a means by which to address present or future solar DER capacity constrained feeders in the next IDP. (CEEM)

Opposed: Xcel

65. Require Xcel to quantify the number, scale and types of DER projects it expects to support with the hosting capacity placeholder in the next IDP. (CEEM, GEC to the extent it is the same as what is contemplated in DO 40)

Opposed: Xcel

66. Require Xcel to explain in the next IDP: (1) if Xcel expects additional load growth, why does it need to reserve capacity? (2) What are the assumptions and calculations used by Xcel to arrive at the hosting capacity number? (3) What off-the-shelf and innovative technology is Xcel actually using in its planning and calculations so as to maximize the use of DERs and minimize spending for new equipment? (CEEM)

Opposed: Xcel

Non-Wires Alternatives

The Commission may select any combination of 67 through 69, or none of the options.

67. Require Xcel to conduct a Request for Information (RFI) process to assess the feasibility of its planned NWA solicitation, including the proposed “ARR split” compensation, and make a compliance filing reporting on the results of the RFI within 12 months of the Commission’s Order in this proceeding. (Fresh Energy, Minneapolis, GEC, Department)

Opposed: Xcel

68. In its next NWA analysis, require Xcel to
- Require Xcel to provide consideration of NWAs for all non-asset-based distribution system projects.
 - Reexamine the deferral period and payment structure as it develops NWA solicitations in future IDPs.
 - Modify its initial NWA analysis to account for the potential of incremental energy efficiency and demand response.
 - Account for the potential long lead time NWA providers may face in developing the NWA solutions and not delay solicitation for bids from the marketplace. (~~Department~~)

Opposed: Xcel, Fresh Energy, Department

69. Require Xcel to file any RFPs for NWA solicitations for Commission approval after a notice and comment period. (Staff interpretation of Minneapolis)

Opposed: Xcel, Department

Stakeholder Processes

The Commission may select Decision Option 70, or not.

70. Delegate authority to the Executive Secretary to conduct stakeholder meeting to discuss developments, identify areas of agreement and disagreement, and discuss next steps for the informal process led by Xcel and the Commission outlined in Decision Options 15, 17, 27, 33, 49, and 55 with the goal of having the discussion with enough time for incorporation into the next IDP filing due by November 1, 2025.
(Staff, Fresh Energy, GEC, Department)
Xcel took no position

XCEL ENERGY DECISION OPTION POSITIONS
2023 INTEGRATED DISTRIBUTION PLAN
DOCKET NO. E002/M-23-452

DO #	DECISION OPTION	Position
1	1. Accept Xcel Energy's 2023 IDP Report as in compliance with IDP reporting requirements. Acceptance of the 2023 IDP has no bearing on prudence nor certification under Minn. Stat. § 216B.2425, subd. 3. (Xcel, Fresh Energy, GEC, Minneapolis)	Support
2	2. Accept Xcel Energy's 2023 IDP report as in compliance with IDP reporting requirements contingent on the Company making additional filings as noted below. Acceptance of the 2023 IDP has no bearing on prudence nor certification under Minn. Stat. § 216B.2425, subd. 3. (Department) a. Find Xcel has not complied with Filing Requirement 3.D.2 and require Xcel to file an amended Appendix C of its IDP to include all required information on grid modernization, including cost-benefit analyses of near-term projects. (Department, CEEM)	Oppose
3	3. Do not accept Xcel Energy's 2023 IDP. (CEEM)	Oppose
4	4. Require Xcel Energy to report all DERs and DER forecasts in MWac in future IDPs. (Staff)	Support
5	5. In future forecasts, require Xcel: (1) to address any impacts from changes in rate design, in particular the use of time-of-use (TOU) rates, on its IDP forecasts and resulting investment planning; and (2) to continue to refine its incorporation of demand response and load flexibility programs into its forecasts in a more granular manner. (GEC, CEEM)	Oppose
6	6. Require Xcel to develop plans to expand load flexibility pilots such that residential customers can opt to participate and be compensated for their load flexibility, taking into consideration recommendations related to their impact on the local distribution system. (GEC)	Oppose
7	7. In its next IDP, Xcel shall report on its progress to improve forecasting, including: a. Refining its residential beneficial electrification forecasts to include low, medium, and high adoption scenarios. b. Presenting an initial C&I beneficial electrification forecast, or if the Company is unable to complete one by that time, the Company shall explain why not and include a detailed explanation of how it is thinking about this forecast, information challenges it raises, and approaches Xcel is considering. c. Evaluating the accuracy of LoadSEER forecasts. d. Utilizing IDP forecast scenarios to perform sensitivities on grid capacity or capital expense plans. (Fresh Energy)	Take No Position
8	8. In future IDPs require Xcel Energy to provide standalone forecasts for demand response, load flexibility, and energy efficiency. (Staff)	Oppose
9	9. Require Xcel to provide in the next IDP for one of the LoadSEER forecasts: a. a complete list of the data sets used in making the LoadSEER forecast, including: i. a brief description of each data set and ii. an explanation of how each was obtained, (e.g., monthly observations, billing data, consumer survey, etc.) or a citation to the source (e.g., population projection from the state demographer); b. a clear identification of any adjustments made to raw data to adapt them for use in the	Oppose

XCEL ENERGY DECISION OPTION POSITIONS

	<p>LoadSEER forecast, including:</p> <ul style="list-style-type: none"> i. the nature of the adjustment, ii. the reason for the adjustment, and iii. the magnitude of the adjustment; <p>c. a discussion of each essential assumption made in preparing the LoadSEER forecast, including:</p> <ul style="list-style-type: none"> i. the need for the assumption, ii. the nature of the assumption, and iii. the sensitivity of forecast results to variations in the essential assumptions; <p>d. an equation showing the LoadSEER forecast model:</p> <ul style="list-style-type: none"> i. for example, $\text{Peak} = a + b1 * \text{Economic Variable} + b2 * \text{CDD/day} \dots$ <p>e. information documenting the LoadSEER forecast's confidence levels including statistical accuracy of the individual variables and overall model=; and</p> <p>f. the outputs from the LoadSEER forecast. (Department)</p>	
10	10. Require Xcel to provide a comparison of the forecast provided in the IDP to actuals in its next IDP. (Department)	Oppose
11	11. Order Xcel to adopt a forecast method that is reviewable by the Department and other parties for the Company's next IDP. (Department)	Oppose
12	12. Require Xcel to double the adoption rate assumptions for electric vehicles and rooftop solar in its next IDP to account for IRA funding. (Minneapolis)	Oppose
13	13. Modify Xcel Energy's IDP filing requirements to discontinue requirement 3.A.9. (Xcel, Department, Fresh Energy)	Support
14	<p>14. Modify Xcel Energy's IDP filing requirements to amend requirement 3.A.26, 3.A.28, and 3.A.29 to remove the requirement that financial information be reported in IDP-specific categories as follows: (Xcel, Department)</p> <p>3.A.26 Historical distribution system spending for the past 5 years; in each category: <u>Information shall be reflected in categories consistent with the</u> <u>Company's cost recovery proceedings.</u></p> <p>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 i. Electric Vehicle Programs 1) Capital Costs 2) O&M Costs 3) Marketing and Communications 4) Other (provide explanation of what is in "other")</p> <p>The Company may provide in the IDP any 2018 or earlier data in the following rate case categories: a. Asset Health b. New Business c. Capacity d. Fleet, Tools, and Equipment e. Grid Modernization</p>	Support

XCEL ENERGY DECISION OPTION POSITIONS

	<p>For each category, provide a description of what items and investments are included.</p> <p>3.A.28 Projected distribution system spending for 5 years into the future for the categories listed above in categories consistent with the Company's cost recovery proceedings. itemizing any non-traditional distribution projects.</p> <p>3.A.29 Planned distribution capital projects, including drivers for the project, timeline for improvement, summary of anticipated changes in historic spending. <u>Projects shall be reflected in categories consistent with the Company's cost recovery proceedings. Driver categories should include:</u> 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 i. Electric Vehicle Programs 1) Capital Costs 2) O&M Costs 3) Marketing and Communications 4) Other (provide explanation of what is in "other")</p>	
15	15. Delegate authority to the Executive Secretary to work with Xcel Energy and stakeholders on ways to modify the IDP budget categories to allow for comparisons between utilities and comparison of historic to forecasted data. Delegate authority to the Executive Secretary to approve via notice a stakeholder agreement on amended filing requirements if one is reached. (Staff)	Take No Position
16	16. Adopt a new IDP filing requirement requiring Xcel to specifically address how beneficial electrification is anticipated to affect the distribution grid and cost allocation issues thereof. (Department)	Oppose
17	17. Delegate Authority to the Executive Secretary to work with Xcel, the Department, and stakeholders to modify the IDP filing requirements to include discussions of the impacts of electrification where appropriate. Delegate authority to the Executive Secretary to approve via notice a stakeholder agreement on amended filing requirements if one is reached. (Staff)	Take No Position
18	18. Direct Xcel to develop a suite of metrics to track resiliency, including SAIDI and SAIFI including MEDs, and other metrics to the extent warranted in its 2024 IDP Annual Compliance filing. (Department)	Oppose
19	19. Require Xcel to propose a set of resiliency performance metrics such as Sandia's that encompass broad system impacts, in addition to SAIDI and SAIFI its 2024 IDP Annual Compliance filing. (Department)	Oppose
20	20. Require Xcel Energy to provide a discussion of how it tracks and considers the restoration of critical customer load, such as hospitals and first responder sites during extended outage events in its next IDP. (Staff)	Take No Position
21	21. Authorize the Executive Secretary to open a docket to study and consider (1) racial disparities in involuntary disconnections and (2) whether the Commission should institute a moratorium on some or all utility-service disconnections by Xcel until Xcel develops a robust set of measures to eliminate racial disparities in disconnections. (Staff modification of GEC)	Take No Position

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22	22. Reject Xcel's recommendation to isolate consideration of the disparities identified by the Xcel Equity Analysis and the Chan/Pradhan analysis in the SRSQ Docket and affirm that the IDP is the appropriate forum to evaluate and discuss distribution planning solutions to address these inequities. (GEC)	Oppose
23	<p>23. In addition to the reporting in its service quality reports and locational reliability map, require Xcel to:</p> <p>a. Report in its 2025 IDP the CELI-12 in neighborhoods where analysis by both the Pradhan and Chan Report and the Company has shown a "strong relationship" between CELI-12 and race when the neighborhood has both a high proportion of people of color and older housing stock.</p> <p>b. Report in its 2025 IDP the level of disconnections in neighborhoods where analysis by both the Pradhan and Chan Report and the Company has shown "the number of disconnections is higher in identified lower-income areas and increases when the proportion of people of color increases within an income group."</p> <p>c. Describe in its 2025 IDP the steps the Company is taking to reduce and eliminate the racial disparities seen in CELI-12 and disconnections in these neighborhoods.</p> <p>Xcel shall recalculate racial disparities as part of this reporting to identify the level of improvement over time. (Fresh Energy)</p>	Oppose
24	24. Require Xcel to incorporate both hosting capacity and equity considerations into its distribution budget prioritization process. (GEC)	Oppose
25	25. Reaffirm that the Commission will rely on the IDP when reviewing utility distribution investments in rate cases, and that if a rate case proposal is inconsistent with the utility's IDP, then the bar for Commission approval is significantly higher. (GEC)	Oppose
26	26. Require Xcel to separate the total "program" and "project" budgets into discrete programs and projects for all Budget Categories in Attachment H, Capital Project List by IDP Category, to the fullest extent possible. (Department)	Oppose
27	27. Require Xcel Energy to engage in additional stakeholder discussions on approaches to apply CBAs, or a similar type of evaluation, strategically to program-level investments for discretionary projects. (Xcel, Fresh Energy, GEC)	Support
28	28. In its next IDP, require Xcel to include a discussion of the results of stakeholder conversations about ways to conduct program-level cost benefit analyses for relevant discretionary distribution expenditures. (Fresh Energy, GEC)	Take No Position
29	29. As part of the stakeholder effort, require Xcel to explain how it would define "discretionary" spending in this context and to explain its cost-benefit methodology, including specifically its identification of benefits. (GEC, CEEM)	Oppose
30	30. Clarify that Xcel must evaluate applying cost-benefit analyses to program-level investments. (GEC, CEEM, Minneapolis)	Oppose
31	<p>31. Direct Xcel to provide a proposal for reporting on the expected benefits and costs of elective distribution grid investments in its next IDP. This proposal shall specifically address the following:</p> <p>a. What is the definition of an elective distribution grid investment?</p> <p>b. What cost threshold, if any, should apply to reporting on the expected benefits and costs of elective distribution grid investments in the IDP?</p> <p>c. For which metrics will Xcel report expected results for its elective distribution grid</p>	Oppose

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	<p>investments?</p> <p>d. For which metrics does Xcel propose that it be required to report results on an ongoing basis for its elective distribution grid investments?</p> <p>(Department)</p>	
32	<p>32. Direct Xcel to provide a proposal for measuring the capacity, reliability, ratepayer, and equity impacts of its distribution grid investments in its next IDP. This proposal shall specifically address the level of granularity at which Xcel will evaluate these impacts for each budget category, indicating for each category whether Xcel plans to measure these impacts at the level of the budget category, program, project, or at some other level of resolution, or not at all, and specifically accounting for the impact of any expected changes to IDP budget categories.</p> <p>(Department)</p>	Oppose
33	<p>33. Delegate authority to the Executive Secretary work with Xcel Energy and stakeholders to discuss metrics reported across distribution dockets and delegate authority to the Executive Secretary to approve via notice a stakeholder agreement on metrics reporting if one is reached. At minimum, the proposal and metrics should include the following components:</p> <ul style="list-style-type: none"> a. Reliability metrics such as SAIDI, SAIFI, CAIDI, CEMI, and CELI b. Distribution spending by IDP budget categories c. Whether there is available hosting capacity for generation or load at the primary system level d. Demographic data including race and income e. Installed DERs, ECO rebates, DR customers enrolled in programs f. Metrics reported at a feeder and/or census block group level (Staff) 	Oppose
34	<p>34. Delegate authority to the Executive Secretary to establish a stakeholder process to develop a framework on cost allocation and proactive upgrades for Xcel Energy. The stakeholder workgroup may also include Dakota Electric Association, Minnesota Power, and Otter Tail Power if they wish to participate. The Commission sets the following guidelines for the process:</p> <ul style="list-style-type: none"> a. The goal of the workgroup is to develop proposals for proactive upgrades and cost allocation for Commission consideration and possible adoption. b. The process does not need to reach consensus but should aim to clearly identify areas of agreement and disagreement to facilitate a Commission decision. c. The Commission establishes a goal of completing the stakeholder process by [insert date]. At the conclusion of the process there will be a notice and comment period on any proposals followed by a Commission decision. d. Proposals should address, at minimum, the following topics: <ul style="list-style-type: none"> i. How to allocate the costs of proactive upgrades ii. How to ensure any proactive upgrades are distributed in an equitable manner throughout a utility's service territory iii. If costs are socialized among ratepayers, whether portions of the upgraded capacity should be reserved for certain customer classes iv. How a proactive upgrade program would integrate with a utility's planned distribution investment programs v. How a utility's other capacity programs and changes to distribution standards impact available hosting capacity vi. How to determine where and when there is a need for proactive upgrades using forecasted DER and load adoption vii. Whether there should be changes to any of a utility's service policy provisions such as Contributions In Aid of Construction (CIAC). (Staff) 	Take No Position

XCEL ENERGY DECISION OPTION POSITIONS

35	35. Require Xcel to host two workshops to advance a framework on DER cost allocation and proactive upgrades. The workshops shall include proposals from stakeholders as well as a proposal from Xcel recommending a path forward. Parties will file meeting materials in this docket, and Xcel must include summaries of stakeholder proposals and stakeholder questions in its next IDP, along with a discussion of its own framework or proposal. (Fresh Energy)	Take No Position
36	36. For its Grid Reinforcements Program, require Xcel to report on actual upgrades undertaken under this budget in its upcoming IDPs, such that the Commission and stakeholders can evaluate its deployment. (GEC, CEEM)	Oppose
37	37. For its placeholder budget for proactive hosting capacity upgrades, require Xcel to: (1) target areas serving all or primarily residential and small commercial customers; and (2) consider the energy justice implications of its proactive grid investments, including specifically evaluating whether it can target upgrades to improve capacity for new load or hosting capacity within “environmental justice areas” where it has identified relatively low or constrained capacity. (GEC)	Oppose
38	38. Require Xcel to consider socializing the costs of such proactive hosting capacity upgrades, targeted to residential and small commercial customers, similar to the treatment of small customer load. (GEC)	Oppose
39	39. Require Xcel to provide options, if any, to help distribute costs to interconnect a small residential facility on a saturated feeder including whether a flat interconnection fee, similar to the small solar array fee, has been considered for larger facilities in its 2024 IDP Annual Compliance filing. (Department)	Oppose
40	40. Require Xcel to explain the scale and scope of DERs it expects to serve with the \$190 million placeholders in its next IDP. (CEEM)	Oppose
41	41. Direct Xcel not to include funds for proactive grid upgrades, such as the Grid Reinforcement Program or the Proactive System Upgrades to Increase Hosting Capacity in its rate case until the Commission has adopted a framework on cost allocation and proactive upgrades. (Staff)	Oppose
42	42. Approve Xcel Energy’s proposed tariff changes waiving CIAC for certain EV customers as outlined in Xcel’s June 12, 2024 Letter. (Xcel)	Support
43	43. Delegate authority to the Executive Secretary to approve the tariff changes outlined in Xcel’s June 12, 2024 Letter via notice if no objections are filed within 30 days of the Commission’s Order. (Staff)	Support
44	44. Deny Xcel’s proposed CIAC waiver for certain EV customers. (OAG)	Oppose
45	45. Require Xcel to track and report on the amount of each CIAC waiver granted to residential customers and the revenues foregone as a result of the waiver and file the data in its Annual EV Reports due June 1 annually. Require Xcel to report the aggregate number and dollar amount of waivers starting with its 2025 IDP. (Staff modification of OAG and CEG)	Take No Position
46	46. Require Xcel to comply with additional grid modernization filing requirements established by the Commission in its July 17, 2023 Order in Docket E002/GR-21-630 by providing a roadmap of planned and contemplated future grid modernization investments and a complete accounting of all historical grid modernization costs and all anticipated future grid modernization costs with its IDP. (Department)	Oppose
47	47. Delegate authority to the Executive Secretary to (1) expand the scope of the Distributed Generated Working Group (DGWG) or (2) create a new working group to address grid modernization issues. (Department)	Oppose

XCEL ENERGY DECISION OPTION POSITIONS

48	48. Determine the Company's Planned Net Load methodology is reasonable. (Department, Xcel)	Support
49	49. Require Xcel to refine its PNL methodology by increasing the PV dependability factor for summer-peaking areas. Xcel shall also evaluate alternative approaches to applying the dependability factor, including applying it to hourly PV generation and to PV nameplate capacity. Xcel shall engage parties that commented on PNL in this proceeding as it evaluates seasonal dependability factors and alternative PNL approaches. Xcel shall include a report describing the results of this evaluation and changes to its proposed PNL methodology in its next IDP. (Fresh Energy, Minneapolis, GEC)	Oppose
50	50. Do not require Xcel to implement the 15 percent DFPV in the next planning cycle for N-0 risk analysis in the next IDP. (Department, Xcel)	Take No Position
51	51. Require Xcel to implement the 15 percent DFPV in the next planning cycle for N-0 risk analysis in the next IDP. (Staff)	Take No Position
52	52. Require Xcel to demonstrate the Company's ability to integrate DERs with the tools available to it today and in the near term, including specifically through: (GEC, the Department, CEEM, Fresh Energy, CEEM) a. Implementing static Flexible Interconnection prior to implementing full, dynamic Flexible Interconnection; and b. Pursuing a staged approach to Flexible Interconnection, DERMS, and Dynamic Hosting Capacity implementation.	Oppose
53	53. Require Xcel to be transparent about the conditions under which the Company will use Flexible Interconnection, particularly with impacted DER owner/operators. (GEC, the Department, CEEM)	Take No Position
54	54. Direct the DGWG to take up the topic of Flexible Interconnection to work through questions related to Static Flexible Interconnection as well as Dynamic Flexible Interconnection which is enabled by DERMS. (GEC, Minneapolis)	Oppose
55	55. Require Xcel to conduct robust stakeholder outreach, including specifically with DER owners/operators, and describe in a filing with the Commission its stakeholder engagement process, the materials it used to inform stakeholders about DERMS (addressing, e.g., costs, benefits, alternatives, purpose, problems it is solving), the feedback it received, and how it has addressed it. The filing shall be filed in Xcel's 2025 IDP, or at the time of request for certification or cost recovery for any DERMS investments, whichever is sooner. (GEC, the Department, CEEM, Fresh Energy)	Oppose
56	56. Require Xcel to file a detailed roadmap for DERMS deployment that addresses the questions provided in subpart c. Xcel must adequately address these questions before any DERMS investments will be approved. The roadmap and answered questions shall be filed: (GEC, the Department, CEEM, Fresh Energy) a. In Xcel's 2025 IDP, or at the time of request for certification or cost recovery for any DERMS investments, whichever is sooner. (Fresh Energy) b. Prior to Commission approval and Company implementation of any DERMS investments. (GEC) c. Questions to consider: i. What are the alternatives to DERMS? ii. What are the specific use cases for which DERMS will be utilized and who are the intended beneficiaries?	Oppose

XCEL ENERGY DECISION OPTION POSITIONS

	<p>iii. Will participation in DER Management be voluntary or required? Will requirements vary based on resource size, resource type, program participation, market participation, or other factors? Will it be available for load interconnections (e.g., EV charging hubs) or interconnections utilizing limited import/export control systems?</p> <p>iv. How will communications be established between Xcel's DERMS and customer DER? Who will bear the ongoing cost for any necessary communications infrastructure?</p> <p>v. How will capacity be allocated across new and existing managed and unmanaged interconnectors? How will capacity upgrades be justified and from whom will upgrade costs be recovered?</p> <p>vi. How will prospective applicants understand the impact of DER management on the economics of their project? What information will be provided to prospective interconnectors related to expected curtailment and existing and expected grid conditions?</p> <p>vii. What are the expected deployment and integrations costs for DERMS? What is the expected ongoing licensing, operating, and infrastructure costs to execute and maintain DERMS functionality? From whom will these costs be recovered?</p> <p>viii. How are equity and energy justice principles being incorporated within the use cases, process design, and cost allocation?</p>	
57	<p>57. Address the DERMS use cases and implementation, and potentially other cross- proceeding and cross-utility issues, such as cost allocation through: (GEC, Minneapolis)</p> <p>a. The DGWG after first expanding the workgroup's scope and changing its name</p>	Oppose
	b. The creation of a separate Commission-led working group dedicated to the topic of DERMS and its related investments	Oppose
58	58. Require that any working group efforts on DERMS and Flexible Interconnection are facilitated by a neutral party, such as a Commission-led working group, and are otherwise consistent with the GECs' general stakeholder engagement recommendations. (GEC)	Take No Position
59	59. Require Xcel file an amended proposal for DI [in this docket] with a complete cost- benefit analysis demonstrating that DI is cost-effective. If the Xcel cannot demonstrate cost-effectiveness on narrow quantitative grounds, then it must provide justification for why it believes that the costs of DI should be allowed for recovery. Require Xcel to make the filing within [180 days] of the Commission's order in this docket. (Department)	Oppose
60	60. Require Xcel to re-evaluate IVVO for its Minnesota service area (applying the new Minnesota Test for cost-effectiveness and updated assumptions informed by PSCo's experience with IVVO). As part of this analysis, Xcel shall identify feeders where IVVO is most cost-effective, discuss the potential for targeted deployment to these areas and/or in under-resourced communities, and report on its updated evaluation within 6 months of the Commission's Order in this proceeding in the current docket. (Fresh Energy, GEC)	Oppose
61	61. Direct Xcel Energy to identify feeders for which IVVO is cost-effective, using the new Minnesota Test and updated assumptions informed by the experience Colorado affiliate (Public Service Company) with IVVO and the Company's forecasts for EV adoption, building electrification, and distributed generation adoption in its 2024 IDP Annual Compliance filing. (Department, Minneapolis)	Oppose
62	62. Require Xcel to include a report of reliability performance for circuits equipped with FLISR, consistent with the Department's recommendations in Docket E002/GR-21-630. (Department)	Take No Position
63	63. Require Xcel to answer the following questions in its next IDP: (1) Which IDP projects and programs are impacted by the TPS, such that the associated investments are higher than they	Oppose

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	would be without the TPS?; and (2) Is it just and reasonable to allow full cost recovery of investments that are inflated by application of the TPS? (GEC)	
64	64. Require Xcel to explain whether energy storage was considered by Xcel as a means by which to address present or future solar DER capacity constrained feeders in the next IDP. (CEEM)	Oppose
65	65. Require Xcel to quantify the number, scale and types of DER projects it expects to support with the hosting capacity placeholder in the next IDP. (CEEM)	Oppose
66	66. Require Xcel to explain in the next IDP: (1) if Xcel expects additional load growth, why does it need to reserve capacity? (2) What are the assumptions and calculations used by Xcel to arrive at the hosting capacity number? (3) What off-the-shelf and innovative technology is Xcel actually using in its planning and calculations so as to maximize the use of DERs and minimize spending for new equipment? (CEEM)	Oppose
67	67. Require Xcel to conduct a Request for Information (RFI) process to assess the feasibility of its planned NWA solicitation, including the proposed “ARR split” compensation, and make a compliance filing reporting on the results of the RFI within 12 months of the Commission’s Order in this proceeding. (Fresh Energy, Minneapolis)	Oppose
68	68. In its next NWA analysis, require Xcel to a. Require Xcel to provide consideration of NWAs for all non-asset-based distribution system projects. b. Reexamine the deferral period and payment structure as it develops NWA solicitations in future IDPs. c. Modify its initial NWA analysis to account for the potential of incremental energy efficiency and demand response. d. Account for the potential long lead time NWA providers may face in developing the NWA solutions and not delay solicitation for bids from the marketplace. (Department)	Oppose
69	69. Require Xcel to file any RFPs for NWA solicitations for Commission approval after a notice and comment period. (Staff interpretation of Minneapolis)	Oppose
70	70. Delegate authority to the Executive Secretary to conduct stakeholder meeting to discuss developments, identify areas of agreement and disagreement, and discuss next steps for the informal process led by Xcel and the Commission outlined in Decision Options 15, 17, 27, 33, 49, and 55 with the goal of having the discussion with enough time for incorporation into the next IDP filing due by November 1, 2025.	Take No Position

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NORTHERN STATES POWER/XCEL ENERGY IDP E002/M-23-452	DOC Position
1. Accept Xcel Energy's 2023 IDP Report as in compliance with IDP reporting requirements. Acceptance of the 2023 IDP has no bearing on prudence nor certification under Minn. Stat. § 216B.2425, subd. 3.	Oppose.
ALTERNATIVE TO 1 2. Accept Xcel Energy's 2023 IDP report as in compliance with IDP reporting requirements contingent on the Company making additional filings as noted below. Acceptance of the 2023 IDP has no bearing on prudence nor certification under Minn. Stat. § 216B.2425, subd. 3. a. Find Xcel has not complied with Filing Requirement 3.D.2 and require Xcel to file an amended Appendix of its IDP to include all required information on grid modernization, including cost-benefit analyses of near-term projects.	Support.
ALTERNATIVE TO 1. 3. Do not accept Xcel Energy's 2023 IDP.	Oppose.
ALTERNATIVE TO 1. 4. Require Xcel Energy to report all DERs and DER forecasts in MW _{ac} in future IDPs.	Support.
Load and DER Forecast 5. In future forecasts, require Xcel: (1) to address any impacts from changes in rate design, in particular the use of time-of-use (TOU) rates, on its IDP forecasts and resulting investment planning; and (2) to continue to refine its incorporation of demand response and load flexibility programs into its forecasts in a more granular manner.	Support.
Load and DER Forecast 6. Require Xcel to develop plans to expand load flexibility pilots such that residential customers can opt to participate and be compensated for their load flexibility, taking into consideration recommendations related to their impact on the local distribution system.	Support
Load and DER Forecast 7. In its next IDP, Xcel shall report on its progress to improve forecasting, including: a. Refining its residential beneficial electrification forecasts to include low, medium, and high adoption scenarios. b. Presenting an initial C&I beneficial electrification forecast, or if the Company is unable to complete one by that time, the Company shall explain why not and include a detailed explanation of how it is thinking about this forecast, information challenges it raises, and approaches Xcel is considering. c. Evaluating the accuracy of LoadSEER forecasts. d. Utilizing IDP forecast scenarios to perform sensitivities on grid capacity or capital expense plans.	Support
Load and DER Forecast 8. In future IDPs require Xcel Energy to provide standalone forecasts for demand response, load flexibility, and energy efficiency.	Support
Load and DER Forecast 9. Require Xcel to provide in the next IDP for one of the LoadSEER forecasts: a. a complete list of the data sets used in making the LoadSEER forecast, including: i. a brief description of each data set and ii. an explanation of how each was obtained, (e.g., monthly observations, billing data, consumer survey, etc.) or a citation to the source (e.g., population projection from the state demographer); b. a clear identification of any adjustments made to raw data to adapt them for use in the LoadSEER forecast, including: i. the nature of the adjustment, ii. the reason for the adjustment, and iii. the magnitude of the adjustment;	Support

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<p>c. a discussion of each essential assumption made in preparing the LoadSEER forecast, including:</p> <ul style="list-style-type: none"> i. the need for the assumption, ii. the nature of the assumption, and iii. the sensitivity of forecast results to variations in the essential assumptions; <p>d. an equation showing the LoadSEER forecast model:</p> <ul style="list-style-type: none"> i. for example, $\text{Peak} = a + b1 * \text{Economic Variable} + b2 * \text{CDD/day} \dots$ <p>e. information documenting the LoadSEER forecast's confidence levels including statistical accuracy of the individual variables and overall model=; and</p> <p>f. the outputs from the LoadSEER forecast.</p>	
<p>Load and DER Forecast</p> <p>10. Require Xcel to provide a comparison of the forecast provided in the IDP to actuals in its next IDP.</p>	Support
<p>Load and DER Forecast</p> <p>11. Order Xcel to adopt a forecast method that is reviewable by the Department and other parties for the Company's next IDP.</p>	Support
<p>Load and DER Forecast</p> <p>12. Require Xcel to double the adoption rate assumptions for electric vehicles and rooftop solar in its next IDP to account for IRA funding.</p>	Oppose
<p>Filing Requirement Modifications</p> <p>13. Modify Xcel Energy's IDP filing requirements to discontinue requirement 3.A.9.</p>	Support
<p>Filing Requirement Modifications</p> <p>14. Modify Xcel Energy's IDP filing requirements to amend requirement 3.A.26, 3.A.28, and 3.A.29 to remove the requirement that financial information be reported in IDP-specific categories as follows: 3.A.26, 3.A.28 and 3.A.29 are discussed in joint briefing papers.</p>	<p>Support.</p> <p>The Department would support including the IDP-specific budget categories in the 2025 IDP, along with the categories of the Company's cost recovery proceedings, to address the concerns raised by Staff prompting DO 15.</p>
<p>Filing Requirement Modifications</p> <p>ALTERNATIVE TO 14</p> <p>15. Delegate authority to the Executive Secretary to work with Xcel Energy and stakeholders on ways to modify the IDP budget categories to allow for comparisons between utilities and comparison of historic to forecasted data. Delegate authority to the Executive Secretary to approve via notice a stakeholder agreement on amended filing requirements if one is reached.</p>	Oppose.
<p>Filing Requirement Modifications</p> <p>16. Adopt a new IDP filing requirement requiring Xcel to specifically address how beneficial electrification is anticipated to affect the distribution grid and cost allocation issues thereof.</p>	Support
<p>Filing Requirement Modifications</p> <p>17. Delegate Authority to the Executive Secretary to work with Xcel, the Department, and stakeholders to modify the IDP filing requirements to include discussions of the impacts of electrification where appropriate. Delegate authority to the Executive Secretary to approve via notice a stakeholder agreement on amended filing requirements if one is reached.</p>	Oppose
<p>Resiliency</p> <p>18. Direct Xcel to develop a suite of metrics to track resiliency, including SAIDI and SAIFI including MEDs, and other metrics to the extent warranted in its 2024 IDP Annual Compliance filing.</p>	Support
<p>Resiliency</p> <p>19. Require Xcel to propose a set of resiliency performance metrics such as Sandia's that encompass broad system impacts, in addition to SAIDI and SAIFI its 2024 IDP Annual Compliance filing.</p>	Support
<p>Resiliency</p>	Oppose

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20. Require Xcel Energy to provide a discussion of how it tracks and considers the restoration of critical customer load, such as hospitals and first responder sites during extended outage events in its next IDP.	
Equity and Energy Justice 21. Authorize the Executive Secretary to open a docket to study and consider (1) racial disparities in involuntary disconnections and (2) whether the Commission should institute a moratorium on some or all utility-service disconnections by Xcel until Xcel develops a robust set of measures to eliminate racial disparities in disconnections.	Support
Equity and Energy Justice 22. Reject Xcel's recommendation to isolate consideration of the disparities identified by the Xcel Equity Analysis and the Chan/Pradhan analysis in the SRSQ Docket and affirm that the IDP is the appropriate forum to evaluate and discuss distribution planning solutions to address these inequities.	Support
Equity and Energy Justice 23. In addition to the reporting in its service quality reports and locational reliability map, require Xcel to: a. Report in its 2025 IDP the CELI-12 in neighborhoods where analysis by both the Pradhan and Chan Report and the Company has shown a "strong relationship" between CELI-12 and race when the neighborhood has both a high proportion of people of color and older housing stock. b. Report in its 2025 IDP the level of disconnections in neighborhoods where analysis by both the Pradhan and Chan Report and the Company has shown "the number of disconnections is higher in identified lower-income areas and increases when the proportion of people of color increases within an income group." c. Describe in its 2025 IDP the steps the Company is taking to reduce and eliminate the racial disparities seen in CELI-12 and disconnections in these neighborhoods. Xcel shall recalculate racial disparities as part of this reporting to identify the level of improvement over time.	Support
Distribution Budget 24. Require Xcel to incorporate both hosting capacity and equity considerations into its distribution budget prioritization process.	Support
Distribution Budget 25. Reaffirm that the Commission will rely on the IDP when reviewing utility distribution investments in rate cases, and that if a rate case proposal is inconsistent with the utility's IDP, then the bar for Commission approval is significantly higher.	Oppose.
Distribution Budget 26. Require Xcel to separate the total "program" and "project" budgets into discrete programs and projects for all Budget Categories in Attachment H, Capital Project List by IDP category, to the fullest extent possible.	Support
Cost Benefit Analysis for Discretionary Investments 27. Require Xcel Energy to engage in additional stakeholder discussions on approaches to apply CBAs, or a similar type of evaluation, strategically to program-level investments for discretionary projects.	Support
Cost Benefit Analysis for Discretionary Investments 28. In its next IDP, require Xcel to include a discussion of the results of stakeholder conversations about ways to conduct program-level cost benefit analyses for relevant discretionary distribution expenditures.	Support
Cost Benefit Analysis for Discretionary Investments 29. As part of the stakeholder effort, require Xcel to explain how it would define "discretionary" spending in this context and to explain its cost-benefit methodology, including specifically its identification of benefits.	Support
Cost Benefit Analysis for Discretionary Investments	Support

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30. Clarify that Xcel must evaluate applying cost-benefit analyses to program-level investments.	
<p>Cost Benefit Analysis for Discretionary Investments</p> <p>31. Direct Xcel to provide a proposal for reporting on the expected benefits and costs of elective distribution grid investments in its next IDP. This proposal shall specifically address the following:</p> <ul style="list-style-type: none"> a. What is the definition of an elective distribution grid investment? b. What cost threshold, if any, should apply to reporting on the expected benefits and costs of elective distribution grid investments in the IDP? c. For which metrics will Xcel report expected results for its elective distribution grid investments? d. For which metrics does Xcel propose that it be required to report results on an ongoing basis for its elective distribution grid investments? 	Support
<p>Cost Benefit Analysis for Discretionary Investments</p> <p>32. Direct Xcel to provide a proposal for measuring the capacity, reliability, ratepayer, and equity impacts of its distribution grid investments in its next IDP. This proposal shall specifically address the level of granularity at which Xcel will evaluate these impacts for each budget category, indicating for each category whether Xcel plans to measure these impacts at the level of the budget category, program, project, or at some other level of resolution, or not at all, and specifically accounting for the impact of any expected changes to IDP budget categories.</p>	<p>Oppose.</p> <p>See explanation below in staff alternative decision option below</p>
<p>Cost Benefit Analysis for Discretionary Investments</p> <p>ALTERNATIVE TO 32.</p> <p>33. Delegate authority to the Executive Secretary work with Xcel Energy and stakeholders to discuss metrics reported across distribution dockets and delegate authority to the Executive Secretary to approve via notice a stakeholder agreement on metrics reporting if one is reached. At minimum, the proposal and metrics should include the following components:</p> <ul style="list-style-type: none"> a. Reliability metrics such as SAIDI, SAIFI, CAIDI, CEMI, and CELI b. Distribution spending by IDP budget categories c. Whether there is available hosting capacity for generation or load at the primary system level d. Demographic data including race and income e. Installed DERs, ECO rebates, DR customers enrolled in programs f. Metrics reported at a feeder and/or census block group level 	<p>Support.</p> <p>The Department appreciates the opportunity to revise the reporting requirements of all IDPs ahead of the next filing, which is an advantage over our initial proposal. We suggest that the stakeholder process includes all four rate-regulated utilities.</p>
<p>Proactive Grid Upgrades and Cost Allocation</p> <p>34. Delegate authority to the Executive Secretary to establish a stakeholder process to develop a framework on cost allocation and proactive upgrades for Xcel Energy. The stakeholder workgroup may also include Dakota Electric Association, Minnesota Power, and Otter Tail Power if they wish to participate. The Commission sets the following guidelines for the process:</p> <ul style="list-style-type: none"> a. The goal of the workgroup is to develop proposals for proactive upgrades and cost allocation for Commission consideration and possible adoption. b. The process does not need to reach consensus but should aim to clearly identify areas of agreement and disagreement to facilitate a Commission decision. c. The Commission establishes a goal of completing the stakeholder process by [insert date]. At the conclusion of the process there will be a notice and comment period on any proposals followed by a Commission decision. d. Proposals should address, at minimum, the following topics: <ul style="list-style-type: none"> • How to allocate the costs of proactive upgrades • How to ensure any proactive upgrades are distributed in an equitable manner throughout a utility's service territory • If costs are socialized among ratepayers, whether portions of the upgraded capacity should be reserved for certain customer classes • How a proactive upgrade program would integrate with a utility's planned distribution investment programs 	<p>Support.</p> <p>The Department sees value in a workshop led by the Commission with all the utilities to standardize a framework for cost allocation ahead of the next cycle of IDPs.</p>

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<ul style="list-style-type: none"> • How a utility's other capacity programs and changes to distribution standards impact available hosting capacity • How to determine where and when there is a need for proactive upgrades using forecasted DER and load adoption • Whether there should be changes to any of a utility's service policy provisions such as Contributions In Aid of Construction (CIAC). 	
Proactive Grid Upgrades and Cost Allocation 35. Require Xcel to host two workshops to advance a framework on DER cost allocation and proactive upgrades. The workshops shall include proposals from stakeholders as well as a proposal from Xcel recommending a path forward. Parties will file meeting materials in this docket, and Xcel must include summaries of stakeholder proposals and stakeholder questions in its next IDP, along with a discussion of its own framework or proposal.	Oppose.
Proactive Grid Upgrades and Cost Allocation 36. For its Grid Reinforcements Program, require Xcel to report on actual upgrades undertaken under this budget in its upcoming IDPs, such that the Commission and stakeholders can evaluate its deployment.	Support
Proactive Grid Upgrades and Cost Allocation 37. For its placeholder budget for proactive hosting capacity upgrades, require Xcel to: (1) target areas serving all or primarily residential and small commercial customers; and (2) consider the energy justice implications of its proactive grid investments, including specifically evaluating whether it can target upgrades to improve capacity for new load or hosting capacity within "environmental justice areas" where it has identified relatively low or constrained capacity.	Oppose. Placeholder budget negated per support of DO 41.
Proactive Grid Upgrades and Cost Allocation 38. Require Xcel to consider socializing the costs of such proactive hosting capacity upgrades, targeted to residential and small commercial customers, similar to the treatment of small customer load.	Oppose. Placeholder budget negated per support of DO 41.
Proactive Grid Upgrades and Cost Allocation 39. Require Xcel to provide options, if any, to help distribute costs to interconnect a small residential facility on a saturated feeder including whether a flat interconnection fee, similar to the small solar array fee, has been considered for larger facilities in its 2024 IDP Annual Compliance filing.	Support
Proactive Grid Upgrades and Cost Allocation 40. Require Xcel to explain the scale and scope of DERs it expects to serve with the \$190 million placeholders in its next IDP.	Support
Proactive Grid Upgrades and Cost Allocation 41. Direct Xcel not to include funds for proactive grid upgrades, such as the Grid Reinforcement Program or the Proactive System Upgrades to Increase Hosting Capacity in its rate case until the Commission has adopted a framework on cost allocation and proactive upgrades.	Support
CIAC Waiver 42. Approve Xcel Energy's proposed tariff changes waiving CIAC for certain EV customers as outlined in Xcel's June 12, 2024 Letter.	Oppose
CIAC Waiver 43. Delegate authority to the Executive Secretary to approve the tariff changes outlined in Xcel's June 12, 2024 Letter via notice if no objections are filed within 30 days of the Commission's Order.	Support
CIAC Waiver 44. Deny Xcel's proposed CIAC waiver for certain EV customers.	Oppose
CIAC Waiver 45. Require Xcel to track and report on the amount of each CIAC waiver granted to residential customers and the revenues foregone as a result of the waiver and file the data in its Annual EV Reports due June 1 annually. Require Xcel to report the aggregate number and dollar amount of waivers starting with its 2025 IDP.	Support
Grid Modernization	Support

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46. Require Xcel to comply with additional grid modernization filing requirements established by the Commission in its July 17, 2023 Order in Docket E002/GR-21-630 by providing a roadmap of planned and contemplated future grid modernization investments and a complete accounting of all historical grid modernization costs and all anticipated future grid modernization costs with its IDP.	
Grid Modernization 47. Delegate authority to the Executive Secretary to (1) expand the scope of the Distributed Generated Working Group (DGWG) or (2) create a new working group to address grid modernization issues.	Oppose. The Department believes that Grid Modernization issues will be sufficiently covered by other stakeholder processes supported elsewhere in this proceeding.
Planned Net Load Methodology 48. Determine the Company's Planned Net Load methodology is reasonable.	Support
Planned Net Load Methodology 49. Require Xcel to refine its PNL methodology by increasing the PV dependability factor for summer-peaking areas. Xcel shall also evaluate alternative approaches to applying the dependability factor, including applying it to hourly PV generation and to PV nameplate capacity. Xcel shall engage parties that commented on PNL in this proceeding as it evaluates seasonal dependability factors and alternative PNL approaches. Xcel shall include a report describing the results of this evaluation and changes to its proposed PNL methodology in its next IDP.	Oppose
Planned Net Load Methodology 50. Do not require Xcel to implement the 15 percent DFPV in the next planning cycle for N-0 risk analysis in the next IDP.	Support.
Planned Net Load Methodology Alternative to 50. 51. Require Xcel to implement the 15 percent DFPV in the next planning cycle for N-0 risk analysis in the next IDP.	Oppose.
DERMS and Flexible Interconnection 52. Require Xcel to demonstrate the Company's ability to integrate DERs with the tools available to it today and in the near term, including specifically through: a. Implementing static Flexible Interconnection prior to implementing full, dynamic Flexible Interconnection; and b. Pursuing a staged approach to Flexible Interconnection, DERMS, and Dynamic Hosting Capacity implementation.	Support.
DERMS and Flexible Interconnection 53. Require Xcel to be transparent about the conditions under which the Company will use Flexible Interconnection, particularly with impacted DER owner/operators.	Support.
DERMS and Flexible Interconnection 54. Direct the DGWG to take up the topic of Flexible Interconnection to work through questions related to Static Flexible Interconnection as well as Dynamic Flexible Interconnection which is enabled by DERMS.	Support
DERMS and Flexible Interconnection 55. Require Xcel to conduct robust stakeholder outreach, including specifically with DER owners/operators, and describe in a filing with the Commission its stakeholder engagement process, the materials it used to inform stakeholders about DERMS (addressing, e.g., costs, benefits, alternatives, purpose, problems it is solving), the feedback it received, and how it has addressed it. The filing shall be filed in Xcel's 2025 IDP, or at the time of request for certification or cost recovery for any DERMS investments, whichever is sooner.	Support.
DERMS and Flexible Interconnection	Support.

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<p>56. Require Xcel to file a detailed roadmap for DERMS deployment that addresses the questions provided in subpart c. Xcel must adequately address these questions before any DERMS investments will be approved. The roadmap and answered questions shall be filed:</p> <ol style="list-style-type: none"> In Xcel's 2025 IDP, or at the time of request for certification or cost recovery for any DERMS investments, whichever is sooner. Prior to Commission approval and Company implementation of any DERMS investments. Questions to consider: <ul style="list-style-type: none"> What are the alternatives to DERMS? What are the specific use cases for which DERMS will be utilized and who are the intended beneficiaries? Will participation in DER Management be voluntary or required? Will requirements vary based on resource size, resource type, program participation, market participation, or other factors? Will it be available for load interconnections (e.g., EV charging hubs) or interconnections utilizing limited import/export control systems? How will communications be established between Xcel's DERMS and customer DER? Who will bear the ongoing cost for any necessary communications infrastructure? How will capacity be allocated across new and existing managed and unmanaged interconnectors? How will capacity upgrades be justified and from whom will upgrade costs be recovered? How will prospective applicants understand the impact of DER management on the economics of their project? What information will be provided to prospective interconnectors related to expected curtailment and existing and expected grid conditions? What are the expected deployment and integrations costs for DERMS? What is the expected ongoing licensing, operating, and infrastructure costs to execute and maintain DERMS functionality? From whom will these costs be recovered? How are equity and energy justice principles being incorporated within the use cases, process design, and cost allocation? 	
<p>DERMS and Flexible Interconnection</p> <p>57. Address the DERMS use cases and implementation, and potentially other cross-proceeding and cross-utility issues, such as cost allocation through:</p> <ol style="list-style-type: none"> The DGWG after first expanding the workgroup's scope and changing its Name <p align="center">OR</p> <ol style="list-style-type: none"> The creation of a separate Commission-led working group dedicated to the topic of DERMS and its related investments. 	Support, alternative A.
<p>DERMS and Flexible Interconnection</p> <p>58. Require that any working group efforts on DERMS and Flexible Interconnection are facilitated by a neutral party, such as a Commission-led working group, and are otherwise consistent with the GECs' general stakeholder engagement recommendations.</p>	Support.
<p>Distributed Intelligence (DI)</p> <p>59. Require Xcel file an amended proposal for DI [in this docket] with a complete cost-benefit analysis demonstrating that DI is cost-effective. If the Xcel cannot demonstrate cost-effectiveness on narrow quantitative grounds, then it must provide justification for why it believes that the costs of DI should be allowed for recovery. Require Xcel to make the filing within [180 days] of the Commission's order in this docket.</p>	Support.
<p>Integrated Volt Var Optimization (IVVO)</p> <p>60. Require Xcel to re-evaluate IVVO for its Minnesota service area (applying the new Minnesota Test for cost-effectiveness and updated assumptions informed by PSCo's experience with IVVO). As part of this analysis, Xcel shall identify feeders where IVVO is most cost-effective, discuss the potential for targeted deployment to these areas and/or in under-resourced communities, and report on its updated evaluation within 6 months of the Commission's Order in this proceeding in the current docket.</p>	Oppose.
<p>Integrated Volt Var Optimization (IVVO)</p>	Support.

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61. Direct Xcel Energy to identify feeders for which IVVO is cost-effective, using the new Minnesota Test and updated assumptions informed by the experience Colorado affiliate (Public Service Company) with IVVO and the Company's forecasts for EV adoption, building electrification, and distributed generation adoption in its 2024 IDP Annual Compliance filing.	
Fault Location, Isolation, and Service Restoration (FLISR) 62. Require Xcel to include a report of reliability performance for circuits equipped with FLISR, consistent with the Department's recommendations in Docket E002/GR-21-630.	Support.
Technical Planning Standard 63. Require Xcel to answer the following questions in its next IDP: (1) Which IDP projects and programs are impacted by the TPS, such that the associated investments are higher than they would be without the TPS?; and (2) Is it just and reasonable to allow full cost recovery of investments that are inflated by application of the TPS?	Take no position.
Technical Planning Standard 64. Require Xcel to explain whether energy storage was considered by Xcel as a means by which to address present or future solar DER capacity constrained feeders in the next IDP.	Take no position.
Technical Planning Standard 65. Require Xcel to quantify the number, scale and types of DER projects it expects to support with the hosting capacity placeholder in the next IDP.	Take no position.
Technical Planning Standard 66. Require Xcel to explain in the next IDP: (1) if Xcel expects additional load growth, why does it need to reserve capacity? (2) What are the assumptions and calculations used by Xcel to arrive at the hosting capacity number? (3) What off-the-shelf and innovative technology is Xcel actually using in its planning and calculations so as to maximize the use of DERs and minimize spending for new equipment?	Take no position.
Non-Wires Alternatives 67. Require Xcel to conduct a Request for Information (RFI) process to assess the feasibility of its planned NWA solicitation, including the proposed "ARR split" compensation, and make a compliance filing reporting on the results of the RFI within 12 months of the Commission's Order in this proceeding.	Support.
Non-Wires Alternatives 68. In its next NWA analysis, require Xcel to a. Require Xcel to provide consideration of NWAs for all non-asset-based distribution system projects. b. Reexamine the deferral period and payment structure as it develops NWA solicitations in future IDPs. c. Modify its initial NWA analysis to account for the potential of incremental energy efficiency and demand response. d. Account for the potential long lead time NWA providers may face in developing the NWA solutions and not delay solicitation for bids from the marketplace.	Oppose. The Department agrees with Staff analysis that further updates to the NWA methodology may cause delays and complications, and making progress on the solicitation process, as contemplated in DO 67, is more valuable at this time.
Non-Wires Alternatives 69. Require Xcel to file any RFPs for NWA solicitations for Commission approval after a notice and comment period.	Oppose.
Stakeholder Processes 70. Delegate authority to the Executive Secretary to conduct stakeholder meeting to discuss developments, identify areas of agreement and disagreement, and discuss next steps for the informal process led by Xcel and the Commission outlined in Decision Options 15, 17, 27, 33, 49, and 55 with the goal of having the discussion with enough time for incorporation into the next IDP filing due by November 1, 2025.	Support. The Department modifies the DO to only include the processes supported by the Department above, corresponding to DOs 27, 33, and 55.

Fresh Energy Preferred Decision Options Xcel ONLY – 23-452

Decision Option #	Decision Option Language	Support/Oppose/No Position
GENERAL	Must select 1,2, <u>OR</u> 3. May Select 4.	
1	Accept Xcel Energy's 2023 IDP Report as in compliance with IDP reporting requirements. Acceptance of the 2023 IDP has no bearing on prudence nor certification under Minn. Stat. § 216B.2425, subd. 3. (Xcel, Fresh Energy, GEC, Minneapolis)	SUPPORT
2	Accept Xcel Energy's 2023 IDP report as in compliance with IDP reporting requirements contingent on the Company making additional filings as noted below. Acceptance of the 2023 IDP has no bearing on prudence nor certification under Minn. Stat. § 216B.2425, subd. 3. (Department) <ul style="list-style-type: none"> a. Find Xcel has not complied with Filing Requirement 3.D.2 and require Xcel to file an amended Appendix C of its IDP to include all required information on grid modernization, including cost-benefit analyses of near-term projects. (Department, CEEM) 	NO POSITION
3	Do not accept Xcel Energy's 2023 IDP. (CEEM)	OPPOSE
4	Require Xcel Energy to report all DERs and DER forecasts in MWac in future IDPs. (Staff)	SUPPORT
LOAD AND DER FORECAST	MAY SELECT ANY COMBO OR NONE AT ALL	
5	In future forecasts, require Xcel: (1) to address any impacts from changes in rate design, in particular the use of time-of-use (TOU) rates, on its IDP forecasts and resulting investment planning; and (2) to continue to refine its incorporation of demand response and load flexibility programs into its forecasts in a more granular manner. (GEC, CEEM)	SUPPORT
6	Require Xcel to develop plans to expand load flexibility pilots such that residential customers can opt to participate and be compensated for their load flexibility, taking into consideration recommendations related to their impact on the local distribution system. (GEC)	SUPPORT
7	In its next IDP, Xcel shall report on its progress to improve forecasting, including: <ul style="list-style-type: none"> a. Refining its residential beneficial electrification forecasts to include low, medium, and high adoption scenarios. b. Presenting an initial C&I beneficial electrification forecast, or if the Company is unable to complete one by that time, the Company shall explain why not and include a detailed explanation of how it is thinking about this forecast, information challenges it raises, and approaches Xcel is considering. c. Evaluating the accuracy of LoadSEER forecasts. d. Utilizing IDP forecast scenarios to perform sensitivities on grid capacity or capital expense plans. (Fresh Energy)	SUPPORT
8	In future IDPs require Xcel Energy to provide standalone forecasts for demand response, load flexibility, and energy efficiency. (Staff)	SUPPORT
9	Require Xcel to provide in the next IDP for one of the LoadSEER forecasts: <ul style="list-style-type: none"> a. a complete list of the data sets used in making the LoadSEER forecast, including: <ul style="list-style-type: none"> i. a brief description of each data set and 	OPPOSE

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	<ul style="list-style-type: none"> ii. an explanation of how each was obtained, (e.g., monthly observations, billing data, consumer survey, etc.) or a citation to the source (e.g., population projection from the state demographer); b. a clear identification of any adjustments made to raw data to adapt them for use in the LoadSEER forecast, including: <ul style="list-style-type: none"> i. the nature of the adjustment, ii. the reason for the adjustment, and iii. the magnitude of the adjustment; c. a discussion of each essential assumption made in preparing the LoadSEER forecast, including: <ul style="list-style-type: none"> i. the need for the assumption, ii. the nature of the assumption, and iii. the sensitivity of forecast results to variations in the essential assumptions; d. an equation showing the LoadSEER forecast model: <ul style="list-style-type: none"> i. for example, $Peak = a + b1 * Economic\ Variable + b2 * CDD/day \dots$ e. information documenting the LoadSEER forecast's confidence levels including statistical accuracy of the individual variables and overall model=; and f. the outputs from the LOADSEER forecast (Department) 	
10	Require Xcel to provide a comparison of the forecast provided in the IDP to actuals in its next IDP. (Department)	SUPPORT
11	Order Xcel to adopt a forecast method that is reviewable by the Department and other parties for the Company's next IDP. (Department)	NO POSITION
12	Require Xcel to double the adoption rate assumptions for electric vehicles and rooftop solar in its next IDP to account for IRA funding. (Minneapolis)	OPPOSE
FILING REQUIREMENT MODIFICATION	COMMISSION MAY SELECT 13	
13	Modify Xcel Energy's IDP filing requirements to discontinue requirement 3.A.9. (Xcel, Department, Fresh Energy)	SUPPORT
SAME SECTION	MAY SELECT 14 <u>OR</u> 15, <u>OR</u> NEITHER (redlines not included here for length)	
14	Modify Xcel Energy's IDP filing requirements to amend requirement 3.A.26, 3.A.28, and 3.A.29 to remove the requirement that financial information be reported in IDP-specific categories as follows: (Xcel, Department)	OPPOSE
15	Delegate authority to the Executive Secretary to work with Xcel Energy and stakeholders on ways to modify the IDP budget categories to allow for comparisons between utilities and comparison of historic to forecasted data. Delegate authority to the Executive Secretary to approve via notice a stakeholder agreement on amended filing requirements if one is reached. (Staff)	SUPPORT
SAME SECTION	MAY SELECT 16 <u>OR</u> 17 <u>OR</u> NEITHER	
16	Adopt a new IDP filing requirement requiring Xcel to specifically address how beneficial electrification is anticipated to affect the distribution grid and cost allocation issues thereof. (Department)	NO POSITION (prefer 17)

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17	Delegate Authority to the Executive Secretary to work with Xcel, the Department, and stakeholders to modify the IDP filing requirements to include discussions of the impacts of electrification where appropriate. Delegate authority to the Executive Secretary to approve via notice a stakeholder agreement on amended filing requirements if one is reached. (Staff)	SUPPORT
RESILIENCY	MAY SELECT 18	
18	Direct Xcel to develop a suite of metrics to track resiliency, including SAIDI and SAIFI including MEDs, and other metrics to the extent warranted in its 2024 IDP Annual Compliance filing. (Department)	OPPOSE
SAME SECTION	MAY SELECT 19 OR 20 OR NEITHER	
19	Require Xcel to propose a set of resiliency performance metrics such as Sandia's that encompass broad system impacts, in addition to SAIDI and SAIFI its 2024 IDP Annual Compliance filing. (Department)	OPPOSE
20	Require Xcel Energy to provide a discussion of how it tracks and considers the restoration of critical customer load, such as hospitals and first responder sites during extended outage events in its next IDP. (Staff)	SUPPORT
EQUITY AND ENERGY JUSTICE	MAY SELECT ANY COMBO OR NONE AT ALL	
21	Authorize the Executive Secretary to open a docket to study and consider (1) racial disparities in involuntary disconnections and (2) whether the Commission should institute a moratorium on some or all utility-service disconnections by Xcel until Xcel develops a robust set of measures to eliminate racial disparities in disconnections. (Staff modification of GEC)	NO POSITION [In this Docket] – Support this work but believe this will be addressed at the July 9 th stakeholder meeting.
22	Reject Xcel's recommendation to isolate consideration of the disparities identified by the Xcel Equity Analysis and the Chan/Pradhan analysis in the SRSQ Docket and affirm that the IDP is the appropriate forum to evaluate and discuss distribution planning solutions to address these inequities. (GEC)	SUPPORT – though not at the exclusion of discussion on disconnections in SRSQ and other relevant dockets
23	In addition to the reporting in its service quality reports and locational reliability map, require Xcel to: <ul style="list-style-type: none"> a. Report in its 2025 IDP the CELI-12 in neighborhoods where analysis by both the Pradhan and Chan Report and the Company has shown a “strong relationship” between CELI-12 and race when the neighborhood has both a high proportion of people of color and older housing stock. b. Report in its 2025 IDP the level of disconnections in neighborhoods where analysis by both the Pradhan and Chan Report and the Company has shown “the number of disconnections is higher in identified lower-income areas and increases when the proportion of people of color increases within an income group.” c. Describe in its 2025 IDP the steps the Company is taking to reduce and eliminate the racial disparities seen in CELI-12 and disconnections in these neighborhoods. Xcel shall recalculate racial disparities as part of this reporting to identify the level of improvement over time. (Fresh Energy)	NO POSITION [in this docket] – Support this work but believe this will be addressed at the July 9 th stakeholder meeting.
DISTRIBUTION BUDGET	MAY SELECT ANY COMBO OR NONE AT ALL	

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24	Require Xcel to incorporate both hosting capacity and equity considerations into its distribution budget prioritization process. (GEC)	SUPPORT
25	Reaffirm that the Commission will rely on the IDP when reviewing utility distribution investments in rate cases, and that if a rate case proposal is inconsistent with the utility's IDP, then the bar for Commission approval is significantly higher. (GEC)	NO POSITION
26	Require Xcel to separate the total “program” and “project” budgets into discrete programs and projects for all Budget Categories in Attachment H, Capital Project List by IDP Category, to the fullest extent possible. (Department)	NO POSITION
COST BENEFIT ANALYSIS FOR DISCRETIONARY INVESTMENTS	MAY SELECT ANY COMBO OR NONE AT ALL	
27	Require Xcel Energy to engage in additional stakeholder discussions on approaches to apply CBAs, or a similar type of evaluation, strategically to program-level investments for discretionary projects. (Xcel, Fresh Energy, GEC)	SUPPORT
28	In its next IDP, require Xcel to include a discussion of the results of stakeholder conversations about ways to conduct program-level cost benefit analyses for relevant discretionary distribution expenditures. (Fresh Energy, GEC)	SUPPORT
29	As part of the stakeholder effort, require Xcel to explain how it would define “discretionary” spending in this context and to explain its cost-benefit methodology, including specifically its identification of benefits. (GEC, CEEM)	SUPPORT
30	Clarify that Xcel must evaluate applying cost-benefit analyses to program-level investments. (GEC, CEEM, Minneapolis)	SUPPORT, but believe it is captured by DO 27
SAME SECTION	MAY SELECT 31 <u>AND/OR</u> 32 <u>OR</u> 33	
31	Direct Xcel to provide a proposal for reporting on the expected benefits and costs of elective distribution grid investments in its next IDP. This proposal shall specifically address the following: <ul style="list-style-type: none"> a. What is the definition of an elective distribution grid investment? b. What cost threshold, if any, should apply to reporting on the expected benefits and costs of elective distribution grid investments in the IDP? c. For which metrics will Xcel report expected results for its elective distribution grid investments? d. For which metrics does Xcel propose that it be required to report results on an ongoing basis for its elective distribution grid investments? (Department)	NO POSITION – we expect this will be discussed in the stakeholder process in DO 27
32	Direct Xcel to provide a proposal for measuring the capacity, reliability, ratepayer, and equity impacts of its distribution grid investments in its next IDP. This proposal shall specifically address the level of granularity at which Xcel will evaluate these impacts for each budget category, indicating for each category whether Xcel plans to measure these impacts at the level of the budget category, program, project, or at some other level of resolution, or not at all, and specifically accounting for the impact of any expected changes to IDP budget categories. (Department)	NO POSITION

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33	<p>Delegate authority to the Executive Secretary work with Xcel Energy and stakeholders to discuss metrics reported across distribution dockets and delegate authority to the Executive Secretary to approve via notice a stakeholder agreement on metrics reporting if one is reached. At minimum, the proposal and metrics should include the following components:</p> <ol style="list-style-type: none"> Reliability metrics such as SAIDI, SAIFI, CAIDI, CEMI, and CELI Distribution spending by IDP budget categories Whether there is available hosting capacity for generation or load at the primary system level Demographic data including race and income Installed DERs, ECO rebates, DR customers enrolled in programs Metrics reported at a feeder and/or census block group level <p>(Staff)</p>	SUPPORT
PROACTIVE GRID UPGRADES AND COST ALLOCATION	MAY SELECT 34 <u>OR</u> 35 <u>OR</u> NEITHER	
34	<p>Delegate authority to the Executive Secretary to establish a stakeholder process to develop a framework on cost allocation and proactive upgrades for Xcel Energy. The stakeholder workgroup may also include Dakota Electric Association, Minnesota Power, and Otter Tail Power if they wish to participate. The Commission sets the following guidelines for the process:</p> <ol style="list-style-type: none"> The goal of the workgroup is to develop proposals for proactive upgrades and cost allocation for Commission consideration and possible adoption. The process does not need to reach consensus but should aim to clearly identify areas of agreement and disagreement to facilitate a Commission decision. The Commission establishes a goal of completing the stakeholder process by [insert date]. At the conclusion of the process there will be a notice and comment period on any proposals followed by a Commission decision. Proposals should address, at minimum, the following topics: <ol style="list-style-type: none"> How to allocate the costs of proactive upgrades How to ensure any proactive upgrades are distributed in an equitable manner throughout a utility's service territory If costs are socialized among ratepayers, whether portions of the upgraded capacity should be reserved for certain customer classes How a proactive upgrade program would integrate with a utility's planned distribution investment programs How a utility's other capacity programs and changes to distribution standards impact available hosting capacity How to determine where and when there is a need for proactive upgrades using forecasted DER and load adoption Whether there should be changes to any of a utility's service policy provisions such as Contributions In Aid of Construction (CIAC). <p>(Staff)</p>	SUPPORT
35	<p>Require Xcel to host two workshops to advance a framework on DER cost allocation and proactive upgrades. The workshops shall include proposals from stakeholders as well as a proposal from Xcel recommending a path forward. Parties will file meeting materials in this docket, and Xcel must include summaries of stakeholder proposals and stakeholder questions in its next IDP, along with a discussion of its own framework or proposal. (Fresh Energy)</p>	NO POSITION; prefer 34

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SAME SECTION	MAY SELECT ANY COMBO OR NONE AT ALL	
36	For its Grid Reinforcements Program, require Xcel to report on actual upgrades undertaken under this budget in its upcoming IDPs, such that the Commission and stakeholders can evaluate its deployment. (GEC, CEEM)	NO POSITION
37	For its placeholder budget for proactive hosting capacity upgrades, require Xcel to: (1) target areas serving all or primarily residential and small commercial customers; and (2) consider the energy justice implications of its proactive grid investments, including specifically evaluating whether it can target upgrades to improve capacity for new load or hosting capacity within “environmental justice areas” where it has identified relatively low or constrained capacity. (GEC)	OPPOSE; we expect these issues will be discussed in the stakeholder process reflected in 34.
38	Require Xcel to consider socializing the costs of such proactive hosting capacity upgrades, targeted to residential and small commercial customers, similar to the treatment of small customer load. (GEC)	OPPOSE; we expect these issues will be discussed in the stakeholder process reflected in 34.
39	Require Xcel to provide options, if any, to help distribute costs to interconnect a small residential facility on a saturated feeder including whether a flat interconnection fee, similar to the small solar array fee, has been considered for larger facilities in its 2024 IDP Annual Compliance filing. (Department)	OPPOSE; we expect this will be addressed in the stakeholder process prompted by new interconnection legislation.
40	Require Xcel to explain the scale and scope of DERs it expects to serve with the \$190 million placeholders in its next IDP. (CEEM)	OPPOSE
41	Direct Xcel not to include funds for proactive grid upgrades, such as the Grid Reinforcement Program or the Proactive System Upgrades to Increase Hosting Capacity in its rate case until the Commission has adopted a framework on cost allocation and proactive upgrades. (Staff)	Regarding Proactive Upgrades for Hosting Capacity: SUPPORT Regarding Grid Reinforcement Program: NO POSITION
CIAC WAIVER	SHOULD SELECT 42, 43, <u>OR</u> 44. <u>IF 42 OR 43 IS SELECTED</u>, COMMISSION MAY ALSO SELECT 45.	
42	Approve Xcel Energy’s proposed tariff changes waiving CIAC for certain EV customers as outlined in Xcel’s June 12, 2024 Letter. (Xcel)	SUPPORT
43	Delegate authority to the Executive Secretary to approve the tariff changes outlined in Xcel’s June 12, 2024 Letter via notice if no objections are filed within 30 days of the Commission’s Order. (Staff)	OPPOSE, prefer 42
44	Deny Xcel’s proposed CIAC waiver for certain EV customers. (OAG)	OPPOSE
45	Require Xcel to track and report on the amount of each CIAC waiver granted to residential customers and the revenues foregone as a result of the waiver and file the data in its Annual EV Reports due June 1 annually. Require Xcel to report the aggregate number and dollar amount of waivers starting with its 2025 IDP. (Staff modification of OAG and CEG)	SUPPORT

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GRID MODERNIZATION	MAY SELECT ANY COMBO OR NONE AT ALL	
46	Require Xcel to comply with additional grid modernization filing requirements established by the Commission in its July 17, 2023 Order in Docket E002/GR-21-630 by providing a roadmap of planned and contemplated future grid modernization investments and a complete accounting of all historical grid modernization costs and all anticipated future grid modernization costs with its IDP. (Department)	NO POSITION
47	Delegate authority to the Executive Secretary to (1) expand the scope of the Distributed Generated Working Group (DGWG) or (2) create a new working group to address grid modernization issues. (Department)	OPTION (1): OPPOSE OPTION (2): NO POSITION
PLANNED NET LOADING METHODOLOGY	SHOULD SELECT 48 <u>OR</u> 49	
48	Determine the Company's Planned Net Load methodology is reasonable. (Department, Xcel)	OPPOSE
49	Require Xcel to refine its PNL methodology by increasing the PV dependability factor for summer-peaking areas. Xcel shall also evaluate alternative approaches to applying the dependability factor, including applying it to hourly PV generation and to PV nameplate capacity. Xcel shall engage parties that commented on PNL in this proceeding as it evaluates seasonal dependability factors and alternative PNL approaches. Xcel shall include a report describing the results of this evaluation and changes to its proposed PNL methodology in its next IDP. (Fresh Energy, Minneapolis, GEC)	SUPPORT
SAME SECTION	SHOULD SELECT 50 <u>OR</u> 51	
50	Do not require Xcel to implement the 15 percent DFPV in the next planning cycle for N-0 risk analysis in the next IDP. (Department, Xcel)	OPPOSE
51	Require Xcel to implement the 15 percent DFPV in the next planning cycle for N-0 risk analysis in the next IDP. (Staff)	SUPPORT
DERMS AND FLEXIBLE INTERCONNECTION	MAY SELECT ANY COMBO OR NONE AT ALL	
52	Require Xcel to demonstrate the Company's ability to integrate DERs with the tools available to it today and in the near term, including specifically through: (<i>GEC, the Department, CEEM, Fresh Energy, CEEM</i>) <ul style="list-style-type: none"> a. Implementing static Flexible Interconnection prior to implementing full, dynamic Flexible Interconnection; and b. Pursuing a staged approach to Flexible Interconnection, DERMS, and Dynamic Hosting Capacity implementation. 	SUPPORT
53	Require Xcel to be transparent about the conditions under which the Company will use Flexible Interconnection, particularly with impacted DER owner/operators. (<i>GEC, the Department, CEEM</i>)	SUPPORT
54	Direct the DGWG to take up the topic of Flexible Interconnection to work through questions related to Static Flexible Interconnection as well as Dynamic Flexible Interconnection which is enabled by DERMS. (<i>GEC, Minneapolis</i>)	SUPPORT

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55	Require Xcel to conduct robust stakeholder outreach, including specifically with DER owners/operators, and describe in a filing with the Commission its stakeholder engagement process, the materials it used to inform stakeholders about DERMS (addressing, e.g., costs, benefits, alternatives, purpose, problems it is solving), the feedback it received, and how it has addressed it. The filing shall be filed in Xcel's 2025 IDP, or at the time of request for certification or cost recovery for any DERMS investments, whichever is sooner. (<i>GEC, the Department, CEEM, Fresh Energy</i>)	SUPPORT
56	<p>Require Xcel to file a detailed roadmap for DERMS deployment that addresses the questions provided in subpart c. Xcel must adequately address these questions before any DERMS investments will be approved. The roadmap and answered questions shall be filed: (<i>GEC, the Department, CEEM, Fresh Energy</i>)</p> <ol style="list-style-type: none"> a. In Xcel's 2025 IDP, or at the time of request for certification or cost recovery for any DERMS investments, whichever is sooner. (<i>Fresh Energy</i>) b. Prior to Commission approval and Company implementation of any DERMS investments. (<i>GEC</i>) c. Questions to consider: <ol style="list-style-type: none"> i. What are the alternatives to DERMS? ii. What are the specific use cases for which DERMS will be utilized and who are the intended beneficiaries? iii. Will participation in DER Management be voluntary or required? Will requirements vary based on resource size, resource type, program participation, market participation, or other factors? Will it be available for load interconnections (e.g., EV charging hubs) or interconnections utilizing limited import/export control systems? iv. How will communications be established between Xcel's DERMS and customer DER? Who will bear the ongoing cost for any necessary communications infrastructure? v. How will capacity be allocated across new and existing managed and unmanaged interconnectors? How will capacity upgrades be justified and from whom will upgrade costs be recovered? vi. How will prospective applicants understand the impact of DER management on the economics of their project? What information will be provided to prospective interconnectors related to expected curtailment and existing and expected grid conditions? vii. What are the expected deployment and integrations costs for DERMS? What is the expected ongoing licensing, operating, and infrastructure costs to execute and maintain DERMS functionality? From whom will these costs be recovered? viii. How are equity and energy justice principles being incorporated within the use cases, process design, and cost allocation? 	SUPPORT, Regarding timing: Prefer b
SAME SECTION	MAY SELECT 57 AND/OR 58 OR NEITHER	
57	<p>57. Address the DERMS use cases and implementation, and potentially other cross-proceeding and cross-utility issues, such as cost allocation through: (<i>GEC, Minneapolis</i>)</p> <ol style="list-style-type: none"> a. The DGWG after first expanding the workgroup's scope and changing its name <p>OR</p> <ol style="list-style-type: none"> b. The creation of a separate Commission-led working group dedicated to the topic of DERMS and its related investments 	OPPOSE

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58	58. Require that any working group efforts on DERMS and Flexible Interconnection are facilitated by a neutral party, such as a Commission-led working group, and are otherwise consistent with the GECs' general stakeholder engagement recommendations. (GEC)	SUPPORT
DISTRIBUTED INTELLIGENCE (DI)	MAY SELECT 59 OR NOT	
59	Require Xcel file an amended proposal for DI [in this docket] with a complete cost-benefit analysis demonstrating that DI is cost-effective. If the Xcel cannot demonstrate cost-effectiveness on narrow quantitative grounds, then it must provide justification for why it believes that the costs of DI should be allowed for recovery. Require Xcel to make the filing within [180 days] of the Commission's order in this docket. (Department)	NO POSITION
IVVO	MAY SELECT 60 <u>OR</u> 61 OR NEITHER	
60	Require Xcel to re-evaluate IVVO for its Minnesota service area (applying the new Minnesota Test for cost-effectiveness and updated assumptions informed by PSCo's experience with IVVO). As part of this analysis, Xcel shall identify feeders where IVVO is most cost-effective, discuss the potential for targeted deployment to these areas and/or in under-resourced communities, and report on its updated evaluation within 6 months of the Commission's Order in this proceeding in the current docket. (Fresh Energy, GEC)	SUPPORT
61	Direct Xcel Energy to identify feeders for which IVVO is cost-effective, using the new Minnesota Test and updated assumptions informed by the experience Colorado affiliate (Public Service Company) with IVVO and the Company's forecasts for EV adoption, building electrification, and distributed generation adoption in its 2024 IDP Annual Compliance filing. (Department, Minneapolis)	NO POSITION
FAULT LOCATION, ISOLATION, AND SERVICE RESTORATION	MAY SELECT 62 OR NOT	
62	Require Xcel to include a report of reliability performance for circuits equipped with FLISR, consistent with the Department's recommendations in Docket E002/GR-21-630. (Department)	NO POSITION
TECHNICAL PLANNING STANDARD	- NO DIRECTION GIVEN -	
63	Require Xcel to answer the following questions in its next IDP: (1) Which IDP projects and programs are impacted by the TPS, such that the associated investments are higher than they would be without the TPS?; and (2) Is it just and reasonable to allow full cost recovery of investments that are inflated by application of the TPS? (GEC)	NO POSITION
64	Require Xcel to explain whether energy storage was considered by Xcel as a means by which to address present or future solar DER capacity constrained feeders in the next IDP. (CEEM)	NO POSITION
65	Require Xcel to quantify the number, scale and types of DER projects it expects to support with the hosting capacity placeholder in the next IDP. (CEEM)	NO POSITION

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66	Require Xcel to explain in the next IDP: (1) if Xcel expects additional load growth, why does it need to reserve capacity? (2) What are the assumptions and calculations used by Xcel to arrive at the hosting capacity number? (3) What off-the-shelf and innovative technology is Xcel actually using in its planning and calculations so as to maximize the use of DERs and minimize spending for new equipment? (CEEM)	NO POSITION
NON-WIRES ALTERNATIVES	ANY COMBO OF 67 THROUGH 69, OR NONE AT ALL	
67	Require Xcel to conduct a Request for Information (RFI) process to assess the feasibility of its planned NWA solicitation, including the proposed “ARR split” compensation, and make a compliance filing reporting on the results of the RFI within 12 months of the Commission’s Order in this proceeding. (Fresh Energy, Minneapolis)	SUPPORT
68	In its next NWA analysis, require Xcel to <ul style="list-style-type: none"> a. Require Xcel to provide consideration of NWAs for all non-asset-based distribution system projects. b. Reexamine the deferral period and payment structure as it develops NWA solicitations in future IDPs. c. Modify its initial NWA analysis to account for the potential of incremental energy efficiency and demand response. d. Account for the potential long lead time NWA providers may face in developing the NWA solutions and not delay solicitation for bids from the marketplace. (Department)	OPPOSE
69	Require Xcel to file any RFPs for NWA solicitations for Commission approval after a notice and comment period. (Staff interpretation of Minneapolis)	NO POSITION
STAKEHOLDER PROCESS	MAY SELECT 70 OR NOT	
70	Delegate authority to the Executive Secretary to conduct stakeholder meeting to discuss developments, identify areas of agreement and disagreement, and discuss next steps for the informal process led by Xcel and the Commission outlined in Decision Options 15, 17, 27, 33, 49, and 55 with the goal of having the discussion with enough time for incorporation into the next IDP filing due by November 1, 2025.	SUPPORT

GRID EQUITY COMMENTERS' POSITIONS ON DECISION OPTIONS

1. Support
2. Oppose
 - a. Oppose
3. Oppose
4. Support
5. Support
6. Support
7. Support, consistent with the GECs comments on these topics and general interest in seeing ongoing improvements to forecasting.
8. Support, consistent with the GECs' recommendations in our comments related to improved demand response and load flexibility forecasting.
9. Support. Although the GECs did not comment on the Department's proposal, we agree that such data would help validate forecasts and could be useful in analyzing equity impacts, as well. We recognize concerns regarding proprietary and otherwise protected information, and suggest considering whether protective agreements could address those concerns and/or whether the Department's list could be modified to mitigate them.
10. Support. Although the GECs did not comment on the Department's proposal, we agree that such a comparison would help show the accuracy of Xcel's forecasts and inform potential future improvements going forward.
11. No position
12. No position
13. No position
14. Oppose
15. Support. The GECs did not comment on this issue, however we agree with Staff's analysis, particularly with respect to the importance of being able to compare across utilities and to compare IDPs over time, and support their proposed path for finding the best solution to enable these comparisons going forward.
16. No position
17. Support. The GECs agree that addressing beneficial electrification in the IDP is important, and appreciate Staff's analysis and efforts to find a compromise solution that promotes more explicit discussion of how utilities are planning for electrification impacts in load forecasts and system planning. We agree that the path captured in this decision option is a reasonable approach at this time.
18. No position
19. No position
20. No position
21. Support
22. Support
23. Support, consistent with GECs' other comments and positions on these issues.
24. Support
25. Support

GRID EQUITY COMMENTERS' POSITIONS ON DECISION OPTIONS

26. No position
27. Support
28. Support
29. Support
30. Support
31. No position
32. No position
33. Support. The GECs agree with Staff regarding the value of stepping back and evaluating metrics and reporting across dockets. The GECs also suggest that it may be appropriate to discuss the Department's and Staff's proposals related to resiliency metrics (DOs 18-20) within this effort. While the GECs do not currently take a position on the proposed metrics/approaches in DOs 18-20, we agree resiliency is a critical issue and further note that, like reliability, it has significant equity implications.
34. Support. The GECs appreciate Staff's efforts to capture stakeholder interest in an effective and robust stakeholder process on these issues. In addition, while we support several related decision options below, we also think they would be appropriate for discussion within this stakeholder process.
35. No position. The GECs support and strongly prefer DO 34 above, and, as discussed in our comments, do not find the Xcel-led two-workshop approach sufficient. However, if the Commission rejects DO 34, the GECs would not oppose such workshops if they were the only option available for stakeholder engagement on these issues.
36. Support.
37. Support. The GECs would also support discussion of proposals to advance these goals within the stakeholder process described in DO 34 above.
38. Support. The GECs would also support discussion of this issue within the stakeholder process described in DO 34 above.
39. Support. Although the GECs did not take a position in comments, the Department's proposal is consistent with the GECs' interest in enabling DERs and in reconsidering the traditional cost allocation paradigm. The GECs would also support discussion of this idea within the stakeholder process described in DO 34 above.
40. Support. Although the GECs did not address this proposal in comments, we agree that, if Xcel moves forward with its proactive hosting capacity efforts under its placeholder budget, it should explain more detail the scale and scope of DERs it expects to serve. The GECs would also support discussion of this issue within the stakeholder process described in DO 34 above.
41. Support. The GECs agree with Staff's analysis of this issue.
42. No position.
43. No position.
44. No position.
45. Support. Although the GECs did not address this issue in comments and do not take a position on the tariff/waiver at this time, we agree that tracking and reporting the number and dollar amount would be helpful to enable the Commission and stakeholder to better understand and address this issue in the future.
46. No position.
47. No position.
48. Oppose

GRID EQUITY COMMENTERS' POSITIONS ON DECISION OPTIONS

- 49. Support
- 50. Oppose
- 51. Support. Although the GECs continue to find the 15 percent DFPV to be overly conservative, we agree with Staff that this approach offers little risk as well as little benefit, and there is some benefit to Xcel gaining experience in applying some version of the PNL methodology, even as it works to improve it under DO 49.
- 52. Support
- 53. Support
- 54. Support
- 55. Support
- 56. Support
 - a. Support (first choice). Upon further consideration, the GECs agree with Fresh Energy that this is a more specific and appropriate requirement as far as timing for the roadmap.
 - b. Support (second choice). If the Commission prefers this path, the GECs would also support it, in order to ensure that the roadmap is filed in advance of any DERMS investments.
 - c. Support
- 57. No position. While the GECs would not oppose such a working group if the Commission deems it worthwhile, the GECs are comfortable with moving forward with stakeholder engagement through DO 34 (cost allocation/proactive upgrades) and DOs 53-56 (Flexible Interconnection/DERMS). We also recognize Staff's concern that the DGWG already has a long priority list and may not be well suited to taking on the larger DERMS discussion at this time.
- 58. Support
- 59. No position
- 60. Support
- 61. No position
- 62. No position
- 63. Support
- 64. No position
- 65. Support, to the extent it captures the same proposal as DO 40, and see explanation above. Otherwise, no position.
- 66. No position
- 67. Support. Although the GECs did not take a position on this proposal in comments, we agree with parties' reasoning for it.
- 68. No position
- 69. No position
- 70. Support, consistent with our support for DOs 15, 17, 27, 33, 49, and 55.

OAG – Preferred Decision Options

The OAG supports the following decision options as set forth in Staff Briefing Papers:

Decision Options the OAG Supports		
No.	Topic	Decision Option Text
23	Equity/Energy Justice	In addition to the reporting in its service quality reports and locational reliability map, require Xcel to: a. Report in its 2025 IDP the CELI-12 in neighborhoods where analysis by both the Pradhan and Chan Report and the Company has shown a “strong relationship” between CELI-12 and race when the neighborhood has both a high proportion of people of color and older housing stock. ... [remainder of decision option as written]
34	Proactive Upgrades and Cost Allocation	Delegate authority to the Executive Secretary to establish a stakeholder process to develop a framework on cost allocation and proactive upgrades for Xcel Energy. The stakeholder workgroup may also include Dakota Electric Association, Minnesota Power, and Otter Tail Power if they wish to participate. The Commission sets the following guidelines for the process: ... [remainder of decision option as written]
41	Proactive Upgrades	Direct Xcel not to include funds for proactive grid upgrades, such as the Grid Reinforcement Program or the Proactive System Upgrades to Increase Hosting Capacity in its rate case until the Commission has adopted a framework on cost allocation and proactive upgrades.
44	CIAC	Deny Xcel’s proposed CIAC waiver for certain EV customers.

If the Commission approves Xcel’s proposed CIAC tariff waiver, the OAG would support a new version of Decision Option 45:

New 45:

Require Xcel to track the following information for each CIAC waiver granted to a residential EV customer:

- a. A brief description of the upgrade;
- b. The total cost of the upgrade;
- c. The amount of CIAC waived;
- d. The customer’s rate code; and
- e. The customer’s census block group.

Require Xcel to include this information in its annual EV reports for the most recent 12-month period. Require Xcel to report the aggregate number and dollar amount of waivers starting with its 2025 IDP.

For all other decision options, the OAG takes no position.

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[23-452] Xcel IDP – Clean Energy Groups – Decision Options

Summary:

CEGs support DOs 17, 34, 42, 45

CEGs oppose DO 44

CEGs take no position on all remaining DOs

Decision Option #	Decision Option Language	Support/Do Not Support/No Position
GENERAL	Must select 1,2, <u>OR</u> 3. May Select 4.	
1	Accept Xcel Energy's 2023 IDP Report as in compliance with IDP reporting requirements. Acceptance of the 2023 IDP has no bearing on prudency nor certification under Minn. Stat. § 216B.2425, subd. 3. (Xcel, Fresh Energy, GEC, Minneapolis)	NO POSITION
2	Accept Xcel Energy's 2023 IDP report as in compliance with IDP reporting requirements contingent on the Company making additional filings as noted below. Acceptance of the 2023 IDP has no bearing on prudency nor certification under Minn. Stat. § 216B.2425, subd. 3. (Department) <ul style="list-style-type: none"> a. Find Xcel has not complied with Filing Requirement 3.D.2 and require Xcel to file an amended Appendix C of its IDP to include all required information on grid modernization, including cost-benefit analyses of near-term projects. (Department, CEEM) 	NO POSITION
3	Do not accept Xcel Energy's 2023 IDP. (CEEM)	NO POSITION
4	Require Xcel Energy to report all DERs and DER forecasts in MWac in future IDPs. (Staff)	NO POSITION
LOAD AND DER FORECAST	MAY SELECT ANY COMBO OR NONE AT ALL	
5	In future forecasts, require Xcel: (1) to address any impacts from changes in rate design, in particular the use of time-of-use (TOU) rates, on its IDP forecasts and resulting investment planning; and (2) to continue to refine its incorporation of demand response and load flexibility programs into its forecasts in a more granular manner. (GEC, CEEM)	NO POSITION
6	Require Xcel to develop plans to expand load flexibility pilots such that residential customers can opt to participate and be compensated for their load flexibility, taking into consideration recommendations related to their impact on the local distribution system. (GEC)	NO POSITION
7	In its next IDP, Xcel shall report on its progress to improve forecasting, including: <ul style="list-style-type: none"> a. Refining its residential beneficial electrification forecasts to include low, medium, and high adoption scenarios. b. Presenting an initial C&I beneficial electrification forecast, or if the Company is unable to complete one by that time, the Company shall explain why not and include a detailed explanation of how it is thinking about this forecast, information challenges it raises, and approaches Xcel is considering. c. Evaluating the accuracy of LoadSEER forecasts. 	NO POSITION

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	d. Utilizing IDP forecast scenarios to perform sensitivities on grid capacity or capital expense plans. (Fresh Energy)	
8	In future IDPs require Xcel Energy to provide standalone forecasts for demand response, load flexibility, and energy efficiency. (Staff)	NO POSITION
9	Require Xcel to provide in the next IDP for one of the LoadSEER forecasts: a. a complete list of the data sets used in making the LoadSEER forecast, including: i. a brief description of each data set and ii. an explanation of how each was obtained, (e.g., monthly observations, billing data, consumer survey, etc.) or a citation to the source (e.g., population projection from the state demographer); b. a clear identification of any adjustments made to raw data to adapt them for use in the LoadSEER forecast, including: i. the nature of the adjustment, i. the reason for the adjustment, and ii. the magnitude of the adjustment; c. a discussion of each essential assumption made in preparing the LoadSEER forecast, including: i. the need for the assumption, ii. the nature of the assumption, and iii. the sensitivity of forecast results to variations in the essential assumptions; d. an equation showing the LoadSEER forecast model: i. for example, $Peak = a + b1 * Economic\ Variable + b2 * CDD/day \dots$ e. information documenting the LoadSEER forecast's confidence levels including statistical accuracy of the individual variables and overall model=; and f. the outputs from the LOADSEER forecast (Department)	NO POSITION
10	Require Xcel to provide a comparison of the forecast provided in the IDP to actuals in its next IDP. (Department)	NO POSITION
11	Order Xcel to adopt a forecast method that is reviewable by the Department and other parties for the Company's next IDP. (Department)	NO POSITION
12	Require Xcel to double the adoption rate assumptions for electric vehicles and rooftop solar in its next IDP to account for IRA funding. (Minneapolis)	NO POSITION
FILING REQUIREMENT MODIFICATION	COMMISSION MAY SELECT 13	
13	Modify Xcel Energy's IDP filing requirements to discontinue requirement 3.A.9. (Xcel, Department, Fresh Energy)	NO POSITION
SAME SECTION	MAY SELECT 14 OR 15, OR NEITHER (redlines not included here for length)	
14	Modify Xcel Energy's IDP filing requirements to amend requirement 3.A.26, 3.A.28, and 3.A.29 to remove the requirement that financial information be reported in IDP-specific categories as follows: (Xcel, Department)	NO POSITION
15	Delegate authority to the Executive Secretary to work with Xcel Energy and stakeholders on ways to modify the IDP budget categories to allow for comparisons between utilities and comparison of historic to forecasted data. Delegate authority to the Executive	NO POSITION

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	Secretary to approve via notice a stakeholder agreement on amended filing requirements if one is reached. (Staff)	
SAME SECTION	MAY SELECT 16 <u>OR</u> 17 <u>OR</u> NEITHER	
16	Adopt a new IDP filing requirement requiring Xcel to specifically address how beneficial electrification is anticipated to affect the distribution grid and cost allocation issues thereof. (Department)	NO POSITION
17	Delegate Authority to the Executive Secretary to work with Xcel, the Department, and stakeholders to modify the IDP filing requirements to include discussions of the impacts of electrification where appropriate. Delegate authority to the Executive Secretary to approve via notice a stakeholder agreement on amended filing requirements if one is reached. (Staff)	SUPPORT
RESILIENCY	MAY SELECT 18	
18	Direct Xcel to develop a suite of metrics to track resiliency, including SAIDI and SAIFI including MEDs, and other metrics to the extent warranted in its 2024 IDP Annual Compliance filing. (Department)	NO POSITION
SAME SECTION	MAY SELECT 19 OR 20 OR NEITHER	
19	Require Xcel to propose a set of resiliency performance metrics such as Sandia's that encompass broad system impacts, in addition to SAIDI and SAIFI its 2024 IDP Annual Compliance filing. (Department)	NO POSITION
20	Require Xcel Energy to provide a discussion of how it tracks and considers the restoration of critical customer load, such as hospitals and first responder sites during extended outage events in its next IDP. (Staff)	NO POSITION
EQUITY AND ENERGY JUSTICE	MAY SELECT ANY COMBO OR NONE AT ALL	
21	Authorize the Executive Secretary to open a docket to study and consider (1) racial disparities in involuntary disconnections and (2) whether the Commission should institute a moratorium on some or all utility-service disconnections by Xcel until Xcel develops a robust set of measures to eliminate racial disparities in disconnections. (Staff modification of GEC)	NO POSITION
22	Reject Xcel's recommendation to isolate consideration of the disparities identified by the Xcel Equity Analysis and the Chan/Pradhan analysis in the SRSQ Docket and affirm that the IDP is the appropriate forum to evaluate and discuss distribution planning solutions to address these inequities. (GEC)	NO POSITION
23	In addition to the reporting in its service quality reports and locational reliability map, require Xcel to: <ul style="list-style-type: none"> a. Report in its 2025 IDP the CELI-12 in neighborhoods where analysis by both the Pradhan and Chan Report and the Company has shown a "strong relationship" between CELI-12 and race when the neighborhood has both a high proportion of people of color and older housing stock. b. Report in its 2025 IDP the level of disconnections in neighborhoods where analysis by both the Pradhan and Chan Report and the Company has shown "the number of disconnections is higher in identified lower-income areas and increases when the proportion of people of color increases within an income group." 	NO POSITION

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	<p>c. Describe in its 2025 IDP the steps the Company is taking to reduce and eliminate the racial disparities seen in CELI-12 and disconnections in these neighborhoods. Xcel shall recalculate racial disparities as part of this reporting to identify the level of improvement over time.</p> <p>(Fresh Energy)</p>	
DISTRIBUTION BUDGET	MAY SELECT ANY COMBO OR NONE AT ALL	
24	Require Xcel to incorporate both hosting capacity and equity considerations into its distribution budget prioritization process. (GEC)	NO POSITION
25	Reaffirm that the Commission will rely on the IDP when reviewing utility distribution investments in rate cases, and that if a rate case proposal is inconsistent with the utility's IDP, then the bar for Commission approval is significantly higher. (GEC)	NO POSITION
26	Require Xcel to separate the total “program” and “project” budgets into discrete programs and projects for all Budget Categories in Attachment H, Capital Project List by IDP Category, to the fullest extent possible. (Department)	NO POSITION
COST BENEFIT ANALYSIS FOR DISCRETIONARY INVESTMENTS	MAY SELECT ANY COMBO OR NONE AT ALL	
27	Require Xcel Energy to engage in additional stakeholder discussions on approaches to apply CBAs, or a similar type of evaluation, strategically to program-level investments for discretionary projects. (Xcel, Fresh Energy, GEC)	NO POSITION
28	In its next IDP, require Xcel to include a discussion of the results of stakeholder conversations about ways to conduct program-level cost benefit analyses for relevant discretionary distribution expenditures. (Fresh Energy, GEC)	NO POSITION
29	As part of the stakeholder effort, require Xcel to explain how it would define “discretionary” spending in this context and to explain its cost-benefit methodology, including specifically its identification of benefits. (GEC, CEEM)	NO POSITION
30	Clarify that Xcel must evaluate applying cost-benefit analyses to program-level investments. (GEC, CEEM, Minneapolis)	NO POSITION
SAME SECTION	MAY SELECT 31 <i>AND/OR</i> 32 <i>OR</i> 33	
31	<p>Direct Xcel to provide a proposal for reporting on the expected benefits and costs of elective distribution grid investments in its next IDP. This proposal shall specifically address the following:</p> <ul style="list-style-type: none"> a. What is the definition of an elective distribution grid investment? b. What cost threshold, if any, should apply to reporting on the expected benefits and costs of elective distribution grid investments in the IDP? c. For which metrics will Xcel report expected results for its elective distribution grid investments? d. For which metrics does Xcel propose that it be required to report results on an ongoing basis for its elective distribution grid investments? <p>(Department)</p>	NO POSITION
32	Direct Xcel to provide a proposal for measuring the capacity, reliability, ratepayer, and equity impacts of its distribution grid investments in its next IDP. This proposal shall specifically address the level of granularity at which Xcel will evaluate these impacts for	NO POSITION

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	each budget category, indicating for each category whether Xcel plans to measure these impacts at the level of the budget category, program, project, or at some other level of resolution, or not at all, and specifically accounting for the impact of any expected changes to IDP budget categories. (Department)	
33	<p>Delegate authority to the Executive Secretary work with Xcel Energy and stakeholders to discuss metrics reported across distribution dockets and delegate authority to the Executive Secretary to approve via notice a stakeholder agreement on metrics reporting if one is reached. At minimum, the proposal and metrics should include the following components:</p> <ul style="list-style-type: none"> a. Reliability metrics such as SAIDI, SAIFI, CAIDI, CEMI, and CELI b. Distribution spending by IDP budget categories c. Whether there is available hosting capacity for generation or load at the primary system level d. Demographic data including race and income e. Installed DERs, ECO rebates, DR customers enrolled in programs f. Metrics reported at a feeder and/or census block group level <p>(Staff)</p>	NO POSITION
PROACTIVE GRID UPGRADES AND COST ALLOCATION	MAY SELECT 34 <u>OR</u> 35 <u>OR</u> NEITHER	
34	<p>Delegate authority to the Executive Secretary to establish a stakeholder process to develop a framework on cost allocation and proactive upgrades for Xcel Energy. The stakeholder workgroup may also include Dakota Electric Association, Minnesota Power, and Otter Tail Power if they wish to participate. The Commission sets the following guidelines for the process:</p> <ul style="list-style-type: none"> a. The goal of the workgroup is to develop proposals for proactive upgrades and cost allocation for Commission consideration and possible adoption. b. The process does not need to reach consensus but should aim to clearly identify areas of agreement and disagreement to facilitate a Commission decision. c. The Commission establishes a goal of completing the stakeholder process by [insert date]. At the conclusion of the process there will be a notice and comment period on any proposals followed by a Commission decision. d. Proposals should address, at minimum, the following topics: <ul style="list-style-type: none"> i. How to allocate the costs of proactive upgrades ii. How to ensure any proactive upgrades are distributed in an equitable manner throughout a utility's service territory iii. If costs are socialized among ratepayers, whether portions of the upgraded capacity should be reserved for certain customer classes iv. How a proactive upgrade program would integrate with a utility's planned distribution investment programs v. How a utility's other capacity programs and changes to distribution standards impact available hosting capacity vi. How to determine where and when there is a need for proactive upgrades using forecasted DER and load adoption vii. Whether there should be changes to any of a utility's service policy provisions such as Contributions In Aid of Construction (CIAC). <p>(Staff)</p>	SUPPORT
35	<p>Require Xcel to host two workshops to advance a framework on DER cost allocation and proactive upgrades. The workshops shall include proposals from stakeholders as well as a proposal from Xcel recommending a path forward. Parties will file meeting materials in this docket, and Xcel must include summaries of stakeholder proposals and stakeholder questions in its next IDP, along with a discussion of its own framework or proposal.</p> <p>(Fresh Energy)</p>	NO POSITION

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SAME SECTION	MAY SELECT ANY COMBO OR NONE AT ALL	
36	For its Grid Reinforcements Program, require Xcel to report on actual upgrades undertaken under this budget in its upcoming IDPs, such that the Commission and stakeholders can evaluate its deployment. (GEC, CEEM)	NO POSITION
37	For its placeholder budget for proactive hosting capacity upgrades, require Xcel to: (1) target areas serving all or primarily residential and small commercial customers; and (2) consider the energy justice implications of its proactive grid investments, including specifically evaluating whether it can target upgrades to improve capacity for new load or hosting capacity within “environmental justice areas” where it has identified relatively low or constrained capacity. (GEC)	NO POSITION
38	Require Xcel to consider socializing the costs of such proactive hosting capacity upgrades, targeted to residential and small commercial customers, similar to the treatment of small customer load. (GEC)	NO POSITION
39	Require Xcel to provide options, if any, to help distribute costs to interconnect a small residential facility on a saturated feeder including whether a flat interconnection fee, similar to the small solar array fee, has been considered for larger facilities in its 2024 IDP Annual Compliance filing. (Department)	NO POSITION
40	Require Xcel to explain the scale and scope of DERs it expects to serve with the \$190 million placeholders in its next IDP. (CEEM)	NO POSITION
41	Direct Xcel not to include funds for proactive grid upgrades, such as the Grid Reinforcement Program or the Proactive System Upgrades to Increase Hosting Capacity in its rate case until the Commission has adopted a framework on cost allocation and proactive upgrades. (Staff)	NO POSITION
CIAC WAIVER	SHOULD SELECT 42, 43, <u>OR</u> 44. <i>IF 42 OR 43 IS SELECTED</i>, COMMISSION MAY ALSO SELECT 45.	
42	Approve Xcel Energy’s proposed tariff changes waiving CIAC for certain EV customers as outlined in Xcel’s June 12, 2024 Letter. (Xcel)	SUPPORT
43	Delegate authority to the Executive Secretary to approve the tariff changes outlined in Xcel’s June 12, 2024 Letter via notice if no objections are filed within 30 days of the Commission’s Order. (Staff)	NO POSITION; prefer 42, but not opposed to this
44	Deny Xcel’s proposed CIAC waiver for certain EV customers. (OAG)	OPPOSE
45	Require Xcel to track and report on the amount of each CIAC waiver granted to residential customers and the revenues foregone as a result of the waiver and file the data in its Annual EV Reports due June 1 annually. Require Xcel to report the aggregate number and dollar amount of waivers starting with its 2025 IDP. (Staff modification of OAG and CEG)	SUPPORT
GRID MODERNIZATION	MAY SELECT ANY COMBO OR NONE AT ALL	
46	Require Xcel to comply with additional grid modernization filing requirements established by the Commission in its July 17, 2023 Order in Docket E002/GR-21-630 by providing a roadmap of planned and contemplated future grid modernization investments and a complete accounting of all historical grid modernization costs and all anticipated future grid modernization costs with its IDP. (Department)	NO POSITION

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47	Delegate authority to the Executive Secretary to (1) expand the scope of the Distributed Generated Working Group (DGWG) or (2) create a new working group to address grid modernization issues. (Department)	NO POSITION
PLANNED NET LOADING METHODOLOGY	SHOULD SELECT 48 <u>OR</u> 49	
48	Determine the Company's Planned Net Load methodology is reasonable. (Department, Xcel)	NO POSITION
49	Require Xcel to refine its PNL methodology by increasing the PV dependability factor for summer-peaking areas. Xcel shall also evaluate alternative approaches to applying the dependability factor, including applying it to hourly PV generation and to PV nameplate capacity. Xcel shall engage parties that commented on PNL in this proceeding as it evaluates seasonal dependability factors and alternative PNL approaches. Xcel shall include a report describing the results of this evaluation and changes to its proposed PNL methodology in its next IDP. (Fresh Energy, Minneapolis, GEC)	NO POSITION
SAME SECTION	SHOULD SELECT 50 <u>OR</u> 51	
50	Do not require Xcel to implement the 15 percent DFPV in the next planning cycle for N-0 risk analysis in the next IDP. (Department, Xcel)	NO POSITION
51	Require Xcel to implement the 15 percent DFPV in the next planning cycle for N-0 risk analysis in the next IDP. (Staff)	NO POSITION
DERMS AND FLEXIBLE INTERCONNECTION	MAY SELECT ANY COMBO OR NONE AT ALL	
52	Require Xcel to demonstrate the Company's ability to integrate DERs with the tools available to it today and in the near term, including specifically through: (<i>GEC, the Department, CEEM, Fresh Energy, CEEM</i>) <ul style="list-style-type: none"> a. Implementing static Flexible Interconnection prior to implementing full, dynamic Flexible Interconnection; and b. Pursuing a staged approach to Flexible Interconnection, DERMS, and Dynamic Hosting Capacity implementation. 	NO POSITION
53	Require Xcel to be transparent about the conditions under which the Company will use Flexible Interconnection, particularly with impacted DER owner/operators. (<i>GEC, the Department, CEEM</i>)	NO POSITION
54	Direct the DGWG to take up the topic of Flexible Interconnection to work through questions related to Static Flexible Interconnection as well as Dynamic Flexible Interconnection which is enabled by DERMS. (<i>GEC, Minneapolis</i>)	NO POSITION
55	Require Xcel to conduct robust stakeholder outreach, including specifically with DER owners/operators, and describe in a filing with the Commission its stakeholder engagement process, the materials it used to inform stakeholders about DERMS (addressing, e.g., costs, benefits, alternatives, purpose, problems it is solving), the feedback it received, and how it has addressed it. The filing shall be filed in Xcel's 2025 IDP, or at the time of request for certification or cost recovery for any DERMS investments, whichever is sooner. (<i>GEC, the Department, CEEM, Fresh Energy</i>)	NO POSITION

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56	<p>Require Xcel to file a detailed roadmap for DERMS deployment that addresses the questions provided in subpart c. Xcel must adequately address these questions before any DERMS investments will be approved. The roadmap and answered questions shall be filed: (<i>GEC, the Department, CEEM, Fresh Energy</i>)</p> <ol style="list-style-type: none"> In Xcel's 2025 IDP, or at the time of request for certification or cost recovery for any DERMS investments, whichever is sooner. (<i>Fresh Energy</i>) Prior to Commission approval and Company implementation of any DERMS investments. (<i>GEC</i>) Questions to consider: <ol style="list-style-type: none"> What are the alternatives to DERMS? What are the specific use cases for which DERMS will be utilized and who are the intended beneficiaries? Will participation in DER Management be voluntary or required? Will requirements vary based on resource size, resource type, program participation, market participation, or other factors? Will it be available for load interconnections (e.g., EV charging hubs) or interconnections utilizing limited import/export control systems? How will communications be established between Xcel's DERMS and customer DER? Who will bear the ongoing cost for any necessary communications infrastructure? How will capacity be allocated across new and existing managed and unmanaged interconnectors? How will capacity upgrades be justified and from whom will upgrade costs be recovered? How will prospective applicants understand the impact of DER management on the economics of their project? What information will be provided to prospective interconnectors related to expected curtailment and existing and expected grid conditions? What are the expected deployment and integrations costs for DERMS? What is the expected ongoing licensing, operating, and infrastructure costs to execute and maintain DERMS functionality? From whom will these costs be recovered? How are equity and energy justice principles being incorporated within the use cases, process design, and cost allocation? 	NO POSITION
SAME SECTION	MAY SELECT 56 AND/OR 57 OR NEITHER	
57	<p>57. Address the DERMS use cases and implementation, and potentially other cross-proceeding and cross-utility issues, such as cost allocation through: (<i>GEC, Minneapolis</i>)</p> <ol style="list-style-type: none"> The DGWG after first expanding the workgroup's scope and changing its name <p>OR</p> <ol style="list-style-type: none"> The creation of a separate Commission-led working group dedicated to the topic of DERMS and its related investments 	NO POSITION
58	<p>58. Require that any working group efforts on DERMS and Flexible Interconnection are facilitated by a neutral party, such as a Commission-led working group, and are otherwise consistent with the GECs' general stakeholder engagement recommendations. (<i>GEC</i>)</p>	NO POSITION
DISTRIBUTED INTELLIGENCE (DI)	MAY SELECT 59 OR NOT	
59	<p>Require Xcel file an amended proposal for DI [in this docket] with a complete cost-benefit analysis demonstrating that DI is cost-effective. If the Xcel cannot demonstrate cost-effectiveness on narrow quantitative grounds, then it must provide justification for why it believes that the costs of DI should be allowed for recovery. Require Xcel to make the filing within [180 days] of the Commission's order in this docket. (<i>Department</i>)</p>	NO POSITION

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IVVO	MAY SELECT 60 <u>OR</u> 61 OR NEITHER	
60	Require Xcel to re-evaluate IVVO for its Minnesota service area (applying the new Minnesota Test for cost-effectiveness and updated assumptions informed by PSCo's experience with IVVO). As part of this analysis, Xcel shall identify feeders where IVVO is most cost-effective, discuss the potential for targeted deployment to these areas and/or in under-resourced communities, and report on its updated evaluation within 6 months of the Commission's Order in this proceeding in the current docket. (Fresh Energy, GEC)	NO POSITION
61	Direct Xcel Energy to identify feeders for which IVVO is cost-effective, using the new Minnesota Test and updated assumptions informed by the experience Colorado affiliate (Public Service Company) with IVVO and the Company's forecasts for EV adoption, building electrification, and distributed generation adoption in its 2024 IDP Annual Compliance filing. (Department, Minneapolis)	NO POSITION
FAULT LOCATION, ISOLATION, AND SERVICE RESTORATION	MAY SELECT 62 OR NOT	
62	Require Xcel to include a report of reliability performance for circuits equipped with FLISR, consistent with the Department's recommendations in Docket E002/GR-21-630. (Department)	NO POSITION
TECHNICAL PLANNING STANDARD	- NO DIRECTION GIVEN -	
63	Require Xcel to answer the following questions in its next IDP: (1) Which IDP projects and programs are impacted by the TPS, such that the associated investments are higher than they would be without the TPS?; and (2) Is it just and reasonable to allow full cost recovery of investments that are inflated by application of the TPS? (GEC)	NO POSITION
64	Require Xcel to explain whether energy storage was considered by Xcel as a means by which to address present or future solar DER capacity constrained feeders in the next IDP. (CEEM)	NO POSITION
65	Require Xcel to quantify the number, scale and types of DER projects it expects to support with the hosting capacity placeholder in the next IDP. (CEEM)	NO POSITION
66	Require Xcel to explain in the next IDP: (1) if Xcel expects additional load growth, why does it need to reserve capacity? (2) What are the assumptions and calculations used by Xcel to arrive at the hosting capacity number? (3) What off-the-shelf and innovative technology is Xcel actually using in its planning and calculations so as to maximize the use of DERs and minimize spending for new equipment? (CEEM)	NO POSITION
NON-WIRES ALTERNATIVES	ANY COMBO OF 67 THROUGH 69, OR NONE AT ALL	
67	Require Xcel to conduct a Request for Information (RFI) process to assess the feasibility of its planned NWA solicitation, including the proposed "ARR split" compensation, and make a compliance filing reporting on the results of the RFI within 12 months of the Commission's Order in this proceeding. (Fresh Energy, Minneapolis)	NO POSITION
68	In its next NWA analysis, require Xcel to <ul style="list-style-type: none"> a. Require Xcel to provide consideration of NWAs for all non-asset-based distribution system projects. 	NO POSITION

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	<ul style="list-style-type: none"> b. Reexamine the deferral period and payment structure as it develops NWA solicitations in future IDPs. c. Modify its initial NWA analysis to account for the potential of incremental energy efficiency and demand response. d. Account for the potential long lead time NWA providers may face in developing the NWA solutions and not delay solicitation for bids from the marketplace. <p>(Department)</p>	
69	Require Xcel to file any RFPs for NWA solicitations for Commission approval after a notice and comment period. (Staff interpretation of Minneapolis)	NO POSITION
STAKEHOLDER PROCESS	MAY SELECT 70 OR NOT	
70	Delegate authority to the Executive Secretary to conduct stakeholder meeting to discuss developments, identify areas of agreement and disagreement, and discuss next steps for the informal process led by Xcel and the Commission outlined in Decision Options 15, 17, 27, 33, 49, and 55 with the goal of having the discussion with enough time for incorporation into the next IDP filing due by November 1, 2025.	NO POSITION