

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

January 27, 2020

In the Matter of Xcel Energy Hosting Capacity Analysis Report  
PUC Docket No. E002/M-19-685

Dear Mr. Barlow:

The City of Minneapolis (“Minneapolis”) appreciates the opportunity to provide supplemental comments on the Xcel Energy (“Xcel” or “the Company”) 2019 hosting capacity analysis report (HCA). Minneapolis also appreciates the work done by Xcel Energy to compile the hosting capacity report and the thoughtful input by stakeholders to date under this docket.

Given the City of Minneapolis 10 percent local generation goal, a robust distribution grid with adequate hosting capacity is an important component of our public infrastructure, which is owned and operated by Xcel. Minneapolis views the HCA as an important planning tool to:

- Identify areas of opportunity for integrating solar
- Identify priority areas where the approximate \$750 million three-year distribution system budget can be directed to:
  - Improve the hosting capacity of the distribution grid for distributed generation and
  - Adequately support beneficial electrification at the levels required to meet state and local climate goals

Minneapolis wishes to highlight our support for some of the recommendations made by other parties that support our vision for the development of a highly functional tool for guiding investment decisions by both the utility and developers.

Below is a high-level summary of recommendations made by the Department of Commerce, Interstate Renewable Energy Council, and Fresh Energy in previous comments that the City of Minneapolis supports:

- Xcel identify and host a meeting for additional stakeholders for involvement in the Company's 2020 hosting capacity analysis
- The State maintain oversight of the technical assumptions and inputs that go into the HCA based on stakeholder discussions.
- Xcel offer training on the use of DRIVE and Synergi tools for practitioners and other interested stakeholders.
- Xcel maintain free public access to the HCA for maximum transparency and usefulness.
- Xcel conduct ongoing Company review of all available solutions for increasing the hosting capacity for each individual feeder with special and urgent attention given to feeders identified as having no or little hosting capacity.
- Xcel transition to monthly updates to the HCA to maximize timeliness and usefulness of the information.
- Xcel publish any hosting capacity-relevant data that DRIVE provides, including all criteria violations and sub-feeder data.
- Include sub-feeder data with adequate granularity to be useful to inform investment decisions by developers and by the Company in cases where there is limited hosting capacity in a format readily available to customers and users.

City of Minneapolis thanks you for your consideration of our comments on this important topic.

Respectfully submitted,



Mr. Kim W. Havey, LEED AP, AICP  
Division of Sustainability

STATE OF MINNESOTA )  
 ) ss.  
COUNTY OF HENNEPIN )  

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**CERTIFICATE OF SERVICE**

I, Kim W. Havey, of the City of Minneapolis, County of Hennepin, State of Minnesota, being duly sworn, state that on the twenty seventh day of January 2020, served a copy/copies of the below listed via e-mail:

**CITY OF MINNEAPOLIS' SUPPLEMENTAL COMMENTS**

at the last known addresses or email address/es of said individuals/entities on the list  
**ATTACHED HERETO.**

*K. W. Havey*  

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