

**STATE OF MINNESOTA  
BEFORE THE PUBLIC UTILITIES COMMISSION**

Nancy Lange	Chair
Dan Lipschultz	Vice Chair
Matt Schuerger	Commissioner
Katie Sieben	Commissioner
John Tuma	Commissioner

In The Matter Of Distribution System  
Planning For Minnesota Power

DOCKET NO. E-015/CI-18-254

**REPLY COMMENTS OF THE OFFICE  
OF THE ATTORNEY GENERAL**

The Office of the Attorney General – Residential Utilities and Antitrust Division (“OAG”) submits these Reply Comments regarding the Integrated Distribution Plan (“IDP”) for Minnesota Power (“MP”). In general, MP suggests slight modifications to the IDP. These Reply Comments reply only to some of MP’s suggestions, and take no position on MP’s other requests.

Regarding Section B of the IDP, MP requests that it be permitted to provide “a single, annual daytime minimum load.” It appears that the purpose of this filing requirement was to obtain the daily minimum load for each feeder in order to inform hosting capacity decisions. It does not seem that MP’s proposal for a single, annual minimum load would provide a similar quality of information as having daily minimums. MP states that it would be time-consuming to provide the daily information, but MP will have more than a year to complete the task. MP should not be released from the requirement to provide daily minimums unless it provides more information demonstrating that the work required would outweigh the benefits of the information.

Regarding Section C, MP requests clarification of the types of DER that should be included. The IDP actually includes a definition of DER: “supply and demand side resources

that can be used throughout an electric distribution system to meet energy and reliability needs of customers; can be installed on either the customer side or utility side of the electric meter.” There does not appear to be a need to re-define DERs at this time, as this definition should suffice as long as MP explains the assumptions it used for its resource scenario analysis.

MP also requests that it use a 10-year outlook rather than a 15-year outlook. Consistent with the IDP that was approved for Xcel, this change appears reasonable.

On MP’s other requests, the OAG defers to the expertise and intention of the Commission’s Staff. The OAG appreciates the work and cooperation from all parties and Staff, and looks forward to reviewing MP’s IDP in November, 2019.

Dated: September 28, 2018

Respectfully submitted,

LORI SWANSON  
Attorney General  
State of Minnesota

s/ **Ryan P. Barlow**

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September 28, 2018

Mr. Daniel Wolf, Executive Secretary  
Minnesota Public Utilities Commission  
121 Seventh Place East, Suite 350  
St. Paul, MN 55101-2147

**Re: *In The Matter Of Distribution System Planning For Minnesota Power***  
**MPUC Docket No. E-015/CI-18-254**

Dear Mr. Wolf:

Enclosed and e-filed in the above-referenced matters please find Comments of the Minnesota Office of the Attorney General – Residential Utilities and Antitrust Division.

By copy of this letter all parties have been served. An Affidavit of Service is also enclosed.

Sincerely,

s/ **Ryan P. Barlow**

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Enclosure



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