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January 29, 2020

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

**Re: *In the Matter of Minnesota Power's 2019 Integrated Distribution Plan*
MPUC Docket No. E-015/M-19-684**

Dear Mr. Barlow:

The Office of the Attorney General—Residential Utilities Division (“OAG”) respectfully submits these Reply Comments in response to the Public Utilities Commission’s (“Commission”) November 15, 2019 Notice of Comment Period issued in the above-captioned docket.¹ These comments reiterate that Commission approval of Minnesota Power’s Integrated Distribution Plan (“IDP”) should not be considered an advanced determination of prudence and support certain of the Department of Commerce’s (“Department”) and Clean Energy Economy Minnesota’s (“CEEM”) IDP recommendations.

In initial comments, the OAG recommended that the Commission incorporate into any approval of Minnesota Power’s IDP an explicit statement that such approval does not constitute an advanced determination of prudence.² CEEM agrees, observing that “[p]re-approval of an action, such as ‘approving’ a distribution system plan, assumes the appropriateness of costs may be determined later. This embeds risk that approval of plans implies spending”³ The OAG concurs with and supports CEEM’s reasoning.

The Department and CEEM offer four (4) additional, and particularly valuable, IDP reporting recommendations. First, both parties conclude that Minnesota Power’s initial IDP should be considered foundational.⁴ The OAG agrees that Minnesota Power’s initial IDP is “the beginning of a dialogue between the utility, regulators, and stakeholders interested in the orderly,

¹ *In the Matter of Minnesota Power's 2019 Integrated Distribution Plan*, Docket No. E015/M-19-684, NOTICE OF COMMENT PERIOD (Nov. 15, 2019) (“MP IDP Docket”).

² MP IDP Docket, OAG COMMENT at 1 (Jan. 15, 2020).

³ MP IDP Docket, CEEM COMMENTS at 3 n.7 (Jan. 15, 2020).

⁴ MP IDP Docket, DEPARTMENT COMMENTS at 2-3, 9 (Jan. 15, 2020); CEEM COMMENTS at 4.

cost-efficient, and synergistic evolution of the distribution system.”⁵ It is imperative, however, that future Minnesota Power IDPs evolve and become more refined so that the Commission, Department, OAG, and other interested stakeholders are more easily able to assess which IDP requirements and investments are beneficial to ratepayers and which are “ineffective, superfluous, or worse, contravene the intent of distribution system planning and create opportunities for utilities to justify unnecessary expenditures of ratepayer funds.”⁶

Next, the Department recommends that Minnesota Power’s future IDPs more directly discuss how they meet the Commission’s planning objectives.⁷ Adoption of this requirement would focus the responsiveness of Minnesota Power’s IDP, potentially minimizing the reporting of extraneous or vague plan information. It would also allow the Commission to more easily identify whether its planning objectives are being addressed.

The Department also recommends that IDP requirements be made uniform across utilities.⁸ Establishing reporting uniformity across utilities would permit interested stakeholders to cross-compare IDPs and possibly identify broader policy issues and trends. Moreover, Commission adoption of reporting uniformity could expand an IDP’s usefulness and ability to inform other Commission dockets.

Finally, CEEM recommends that Minnesota Power be required to strengthen its IDP cost-benefit framework.⁹ The OAG shares CEEM’s view that more robust IDP cost-benefit reporting “plays a critical role in transparent IDP discussions and decision-making.”¹⁰ Such transparency is a necessary precursor to an informed evaluation of ratepayer cost versus ratepayer value and the OAG urges the Commission to adopt CEEM’s recommendation.

In sum, the Commission should not equate IDP approval with an advanced determination of prudence, and should make this explicit in any written order, or other document, it issues approving an IDP. From the OAG’s perspective, it is most appropriate for the Commission to treat Minnesota Power’s 2019 IDP as a baseline for comparison with future IDPs, with the expectation that future IDPs will evolve and become more refined as Minnesota Power gains experience with the IDP process. Finally, adoption of the Department’s and CEEM’s IDP recommendations discussed immediately above would enhance the Commission’s current IDP

⁵ MP IDP Docket, DEPARTMENT COMMENTS at 2.

⁶ *Id.* at 9.

⁷ *Id.* at 8.

⁸ *Id.* at 9.

⁹ MP IDP Docket, CEEM COMMENTS at 4.

¹⁰ *Id.*

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requirements by focusing IDP reporting, creating IDP uniformity across utilities, and improving transparency with respect to ratepayer IDP cost-benefit analyses.

Sincerely,

s/ **Kristin Berkland**

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Enclosure

AFFIDAVIT OF SERVICE

**Re: *In the Matter of Minnesota Power’s Integrated Distribution Plan*
MPUC Docket No. E-015/M-19-684**

STATE OF MINNESOTA)
) ss.
COUNTY OF RAMSEY)

I, JUDY SIGAL, hereby state that on the 29th day of January, 2020, I e-filed with eDockets *a Letter of the Minnesota Office of the Attorney General—Residential Utilities Division* and served the same upon all parties listed on the attached service list by e-mail, electronic submission, and/or United States Mail with postage prepaid, and deposited the same in a U.S. Post Office mail receptacle in the City of St. Paul, Minnesota.

s/ Judy Sigal
JUDY SIGAL

Subscribed and sworn to before me
this 29th day of January, 2020.

s/ Patricia Jotblad
Notary Public

My Commission expires: January 31, 2020.

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John C.	Reinhardt	N/A	Laura A. Reinhardt	3552 26th Ave S Minneapolis, MN 55406	Paper Service	No	OFF_SL_19-684_M-19-684

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_19-684_M-19-684
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206 St. Paul, MN 551011667	Electronic Service	No	OFF_SL_19-684_M-19-684
Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative	P. O. Box 227 Madison, SD 57042	Electronic Service	No	OFF_SL_19-684_M-19-684
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-684_M-19-684
Thomas	Scharff	thomas.scharff@versoco.com	Verso Corp	600 High Street Wisconsin Rapids, WI 54495	Electronic Service	No	OFF_SL_19-684_M-19-684
Larry L.	Schedin	Larry@LLSResources.com	LLS Resources, LLC	332 Minnesota St, Ste W1390 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-684_M-19-684
Christopher	Schoenherr	cp.schoenherr@smmpa.org	SMMPA	500 First Ave SW Rochester, MN 55902-3303	Electronic Service	No	OFF_SL_19-684_M-19-684
Kay	Schraeder	kschraeder@minnkota.com	Minnkota Power	5301 32nd Ave S Grand Forks, ND 58201	Electronic Service	No	OFF_SL_19-684_M-19-684
Dean	Sedgwick	Sedgwick@itascapower.com	Itasca Power Company	PO Box 455 Spring Lake, MN 56680	Electronic Service	No	OFF_SL_19-684_M-19-684

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William	Seuffert	Will.Seuffert@state mn.us		75 Rev Martin Luther King Jr Blvd 130 State Capitol St. Paul, MN 55155	Electronic Service	No	OFF_SL_19-684_M-19-684
David	Shaffer	shaff081@gmail.com	Minnesota Solar Energy Industries Project	1005 Fairmount Ave Saint Paul, MN 55105	Electronic Service	No	OFF_SL_19-684_M-19-684
Patricia	Sharkey	psharkey@environmentalia wcounsel.com	Midwest Cogeneration Association.	180 N. LaSalle Street Suite 3700 Chicago, Illinois 60601	Electronic Service	No	OFF_SL_19-684_M-19-684
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Audra	Skalet	askalet@mienergy.coop	MI Energy Cooperative	31110 Cooperative Way PO Box 626 Rushford, MN 55971	Electronic Service	No	OFF_SL_19-684_M-19-684
Anne	Smart	anne.smart@chargepoint.com	ChargePoint, Inc.	254 E Hacienda Ave Campbell, CA 95008	Electronic Service	No	OFF_SL_19-684_M-19-684
Trevor	Smith	trevor.smith@avantenergy.com	Avant Energy, Inc.	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_19-684_M-19-684
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	OFF_SL_19-684_M-19-684

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Byron E.	Stams	byron.stams@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-684_M-19-684
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Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_19-684_M-19-684
Thomas P.	Sweeney III	tom.sweeney@easycleanenergy.com	Clean Energy Collective	P O Box 1828 Boulder, CO 80306-1828	Electronic Service	No	OFF_SL_19-684_M-19-684

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Lise	Trudeau	lise.trudeau@state.mn.us	Department of Commerce	85 7th Place East Suite 500 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_19-684_M-19-684
Karen	Tumboom	karen.tumboom@versoco.com	Verso Corporation	100 Central Avenue Duluth, MN 55807	Electronic Service	No	OFF_SL_19-684_M-19-684
Andrew	Twite	twite@fresh-energy.org	Fresh Energy	408 St. Peter Street, Ste. 220 St. Paul, MN 55102	Electronic Service	No	OFF_SL_19-684_M-19-684
Lisa	Veith	lisa.veith@ci.stpaul.mn.us	City of St. Paul	400 City Hall and Courthouse 15 West Kellogg Blvd. St. Paul, MN 55102	Electronic Service	No	OFF_SL_19-684_M-19-684
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Christopher	Zibart	czibart@atcllc.com	American Transmission Company LLC	W234 N2000 Ridgeview Pkwy Court Waukesha, WI 53188-1022	Electronic Service	No	OFF_SL_19-684_M-19-684