



February 22, 2019

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E002/CN-18-251

Dear Mr. Wolf:

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

Xcel Energy's Integrated Distribution Plan

As discussed in the attached comments, the Department provides its response to the Minnesota Public Utilities Commission's (Commission) November 19, 2018 *Notice of Comment Period on Xcel Energy's Integrated Distribution Plan*

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

Sincerely,

/s/ MATTHEW LANDI
Rates Analyst

ML/jl
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. E002/CI-18-251

I. BACKGROUND

Over the past several years, the Minnesota Public Utilities Commission (Commission) has investigated utility distribution system planning and the modernization of the electric grid as it pertains to investor-owned utilities generally in Docket No. E999/CI-15-556 (Grid Mod docket) and Xcel Energy specifically in Docket No. E002/M-17-776 (2017 Biennial Report). The Grid Mod docket was discussed at the Commission's April 19, 2018 agenda meeting, in which the Commission reviewed the draft Integrated Distribution Planning (IDP) filing requirements developed through a Commission-led stakeholder process and heard party comments. The proposed requirements direct utilities to file plans addressing: long-term distribution system modifications and investments, considerations used in related planning processes, and long-term distribution system future outlooks, among other requirements.

On August 30, 2018, the Commission issued an Order adopting Integrated Distribution Planning (IDP) filing requirements requiring Xcel Energy (Xcel, or the Company) to file an IDP for the next 10-year horizon by November 1, 2018. Subsequently, Xcel filed its IDP entitled "Integrated Distribution Plan (2019-2028): Advancing the Grid at the Speed of Value" (IDP Report) on November 1, 2018.

The Commission issued a Notice of Comment Period on November 19, 2018. The following topics are open for comment:

1. Should the Commission accept or reject Xcel Energy's Integrated Distribution Plan (IDP)?
2. Does the IDP filed by Xcel Energy achieve the planning objectives outlined in the filing requirements approved in the Commission's August 30, 2018 Order in this docket?
3. What, if any, adjustments should be made to future filing requirements?
4. Are there other issues or concerns related to this matter?

II. DEPARTMENT ANALYSIS

The Minnesota Department of Commerce, Division of Energy Resources (Department) views the Company's initial foray into producing the IDP Report in compliance with the Commission's Order as foundational: the first IDP Report should be generally viewed as the nascent attempt at an iterative process that yields greater insight and transparency into the Company's distribution system planning and operations processes.

In this view, the Department believes that the IDP Report is first and foremost an instructive guide to the Company's internal distribution system planning and operations processes. Utility distribution systems have historically functioned without substantial oversight of regulators. Consequently, an informational asymmetry between the utility and regulators has developed, with regulators playing very little role in overseeing, let alone understanding, distribution system planning and operations processes.

Therefore, the Department views Xcel's first IDP Report as the beginning of a dialogue between the utility, regulators, and stakeholders interested in the orderly, cost-efficient, and synergistic evolution of the distribution system. As emergent technologies lead to new possibilities and paradigms for electric utility customers and the electric utility business model, regulators and other stakeholders need to have a basic understanding of how electric utilities plan and operate their distribution systems.

In this view, the Department's analysis here is limited to ensuring that the substantive requirements of the IDP Report have been fulfilled, and offering suggestions for potential improvements to future IDP reports and potential modifications to IDP Requirements.

The Department's analysis that follows is framed in response to the Commission's Notice.

A. TOPIC #1: SHOULD THE COMMISSION ACCEPT OR REJECT XCEL ENERGY'S INTEGRATED DISTRIBUTION PLAN (IDP)?

The Department views Xcel's first IDP Report as detailed, thorough, and instructive. The Department appreciates the Company's considerable efforts in compiling this report and complying with the IDP Requirements.

The Department recommends that the Commission accept Xcel's IDP Report.

B. TOPIC #2: DOES THE IDP FILED BY XCEL ENERGY ACHIEVE THE PLANNING OBJECTIVES OUTLINED IN THE FILING REQUIREMENTS APPROVED BY THE COMMISSION'S AUGUST 30, 2018 ORDER IN THIS DOCKET?

The Planning Objectives outlined in the filing requirements approved by the Commission's August 30, 2018 Order are as follows:¹

Planning Objectives: The Commission is facilitating comprehensive, coordinated, transparent, integrated distribution plans to:

- Maintain and enhance the safety, security, reliability, and resilience of the electricity grid, at fair and reasonable costs, consistent with the state's energy policies;
- Enable greater customer engagement, empowerment, and options for energy services;
- Move toward the creation of efficient, cost-effective, accessible grid platforms for new products, new services, and opportunities for adoption of new distributed technologies; and,
- Ensure optimized utilization of electricity grid assets and resources to minimize total system costs.
- Provide the Commission with the information necessary to understand Xcel's short-term and long-term distribution system plans, the costs and benefits of specific investments, and a comprehensive analysis of ratepayer cost and value.

As noted above, the Department views Xcel's initial IDP Report as foundational: it should be seen as an informational guide to the utility's internal distribution system planning and operations processes. As such, the IDP Report provides a baseline level of detail and discussion that can be used in the qualitative evaluation of future IDP reports.

In addition to this view, and given that that the IDP process is designed to be iterative and will necessarily evolve over time, the question of whether the planning objectives were achieved by the IDP Report is somewhat premature. Establishing the IDP Report as a baseline understanding of Xcel's internal distribution system planning and operations processes will enable comparisons to it by future IDP reports, and a better qualitative assessment of whether the planning objectives are achieved by future IDP reports can be conducted.

¹ *In the Matter of Distribution System Planning for Xcel Energy*, Docket No. E-002/CI-18-251, ORDER APPROVING INTEGRATED DISTRIBUTION PLANNING FILING REQUIREMENTS FOR XCEL ENERGY at 1 of Attachment 1 (Aug. 30, 2018).

Accordingly, the Department’s review of the IDP Report focuses mainly on whether the Company provided information relevant to the planning objectives listed above such that future analyses can more qualitatively determine whether the outcomes that the planning objectives articulate can materialize over time with the information contained in the IDP report.

In determining whether the planning objectives were furthered by the IDP Report, the Department analyzed whether the Company went into a level of detail that yields a greater understanding of how the Company includes the objectives in: (1) its planning and/or operations processes; and/or (2) its future, planned initiatives and/or investments. While primarily a quantitative analysis, this analysis nevertheless attempts to qualitatively assess whether the substance of the IDP Report furthers the planning objectives.

1. Planning Objective #1

As noted above, the first planning objective of the IDP is designed to maintain and enhance the safety, security, reliability and resilience of the electricity grid, at fair and reasonable costs, consistent with the state’s energy policies.

The Department analyzed Xcel’s IDP Report to see whether the information presented was related to and sufficient in detail to assess the IDP Report’s ability to actualize the first planning objective. Overall the Department’s analysis found that the Company’s IDP Report discussed each of the topics listed in the first planning objective: safety, security, reliability, resilience, fair and reasonable costs, and consistency with state energy policies. The Department provides a high-level analysis of the location of these topics in the IDP Report in Table 1 below.

Table 1. Location of Topics of the First Planning Objective in Xcel’s IDP Report

TOPIC	PAGE #
Safety	Executive Summary Section II.B, pages 9-10; Section II.B, pages 8-9; Section II.D.2.b, page 19; Section III.B, page 24; Section IV.B, pages 31-32; Section V.B.4, pages 62-63; Section VII.A, pages 89-93; Section VIII.A.1, page 108; Section VIII.B pages 111-112; Section IX.F.2.a, pages 138-139; and Section IX.H, page 149.
Security	Executive Summary Section II.A, pages 4-5, 7; Section II.E.2, page 21; Section IX.A, pages 113-115; Section IX.E.1-6, pages 128-136; Section X, page 150; Section X.A.1, pages 151-152; Section X.D, pages 154-156; Section X.E.1, pages 160-162;

Reliability	Executive Summary (ES) Section I, pages 1-2; ES Section II.A, pages 4-6; ES Section II.B, pages 8-9; Section II.A, pages 6-7; Section II.B, page 8; Section II.C, pages 10-11; Section II.D., pages 12-15; Section III.B.1, pages 23-24; Section III.B.3, page 28; Section IV.B, pages 31-32; Section V.A.1-2, pages 41-52; Section V.B.2-4, pages 54-63; Section VI.A.1-2, pages 78-79; Section VII.A-C, pages 89-106; Section VIII.B pages 111-112; Section IX.B.1, pages 116-117; Section IX.D.1-2, page 120; Section IX.D.3, page 123; Section IX.E.3, pages 132-134; Section IX.F.1-6, pages 137-146; Section IX.F.4.b, page 172; Section XI.F.3, pages 205-208; Section XIII.A.2, pages 223-224.
Resilience	Executive Summary Section II.A, pages 4-5; Section II.B, page 9; Section VII.A, pages 89-90; Section VII.B, pages 92-93; Section IX.A, page 114; Section IX.E.3, pages 132-134; Section XIII.A.2, pages 223-224.
Fair and Reasonable Costs	Executive Summary Section I, page 2 (“affordable”); Section II.A, page 6 (“reasonable and affordable rates”); Section II.B, pages 8-9 (“affordable”); Section II.C., page 11 (“affordable”); Section IX.H, pages 148-150; Section XIV.5, pages 231-232.
Consistent with State Energy Policies	Section II.A, pages 6-7; Section XI.D, pages 190-198; Section XII.C, pages 216-222.

As suggested by the table above and in view of the Department’s analysis criteria, this high-level review of the IDP Report concludes that the Company addressed each of topics of the first planning objective in some substantive way.

2. Planning Objective #2

As noted above, the second planning objective of the IDP is to enable greater customer engagement, empowerment, and options for energy services.

The Department analyzed Xcel’s IDP Report to see whether the information presented was related to and sufficient in detail to assess the IDP Report’s ability to actualize the second planning objective. Overall the Department’s analysis found that the Company’s IDP Report provided information and discussion related to the second planning objective.

Xcel began the IDP Report with a discussion about the paradigm shift that the electric utility industry is undergoing and stated the following:²

The electric utility industry is in a time of significant change. Increasing customer expectations and technological advances have reshaped what customers expect from their energy service provider, and how those services are delivered. Technologies that customers can use to control their energy usage, such as smart thermostats, electric (EV) chargers, smart home devices, and even smart phones, are evolving at a fast rate. Influenced by other services, customers have come to expect more now from their energy providers than in the past, including greater choices and levels of service, as well as greater control over their energy sources and their energy use.

At the same time, major industry technological advances provide new capabilities for utility providers to manage the electric distribution grid and service to customers. Electric meters are now equipped to gather more detailed information about customer energy usage, which utilities can leverage to help customers better understand and manage their usage. Other advanced equipment on the grid is able to sense, communicate, and respond in real time to circumstances that would normally result in power outages. Grid operators can also get improved data to better and more proactively plan and operate the grid. These advancements form the foundation for a flexible grid environment that helps support two-way power flows from customer-connected devices or generating resources (such as rooftop solar) and provides utilities with a greater ability to adapt to future developments.

The IDP Report is diffuse with references to how Xcel's distribution system planning processes are in part designed to enable greater customer engagement, empowerment, and options for energy services.

On pages 6 and 7 of the Executive Summary, Xcel provided a high-level overview of the customer-oriented outcomes expected from deploying advanced grid infrastructure and advanced technologies:

² IDP Report, Executive Summary, pages 1-2.

Transformed customer experience. Advanced grid investments combine to provide greater visibility and insight into customer consumption and behavior. We will utilize this information to transform the customer experience through new programs and service offerings, engaging digital experiences, enhanced billing and rate options, and timely outage communications. These options will provide customers greater convenience and control to save money, access to rates and billing options that suit their budgets and lifestyles, and more personalized and actionable communications. We expect our early initiatives will focus on the execution of services that benefit all customers. Other customer choice programs enabled or enhanced by advanced grid initiatives may include smart thermostats, home area networks, rooftop solar, community solar gardens, optimized EV charging, and other DER offerings.

...

These investments also will produce a wealth of customer and grid data, which will, in turn, enable us to provide the new services described here and enhance existing services. These data-related efforts have begun, and next steps will include identifying the analytics capabilities needed to add additional value to customer offerings or improve utility operations. Data analytics in the utility industry continues to mature, so as grid modernization investments are deployed, these capabilities will evolve as well.

Xcel provides greater detail and discussion of these aspects of their distribution system planning when discussing their plans for Advanced Distribution Management System (ADMS),³ Advanced Metering Infrastructure (AMI),⁴ Field Area Network (FAN),⁵ Home Area Network (HAN),⁶ Fault Location, Isolate, and Service Restoration (FLISR),⁷ Distributed Energy Response Management System (DERMS),⁸ and Demand Response Management System (DRMS),⁹ each of

³ IDP Report (ADMS), pages 4-5, 113-117, and 162-163.

⁴ IDP Report (AMI), pages 4-5, 113-116, 118-128, and 148-150.

⁵ IDP Report (FAN), pages 4-5, 113-116, 118, 128-137, and 148-150.

⁶ IDP Report (HAN), page 6, 151, and 160-163.

⁷ IDP Report (FLISR), pages 113-116, 137-147, and 148-150.

⁸ IDP Report (DERMS), pages 117, 127, and 219.

⁹ IDP Report (DRMS), pages 164-165.

which are technological innovations that are geared toward fulfilling the second planning objective. The Department notes that this list is not exhaustive of the items discussed in the IDP Report that relate to the second planning objective. The Department concludes that the Company provided extensive information and discussion of items related to the second planning objective.

3. Planning Objective #3

As noted above, the third planning objective of the IDP is designed to move toward the creation of efficient, cost-effective, accessible grid platforms for new products, new services, and opportunities for adoption of new distributed technologies.

The Department analyzed Xcel's IDP Report to see whether the information presented was related to and in sufficient detail to assess the IDP Report's ability to actualize the third planning objective. Overall the Department's analysis found that the Company's IDP Report provided information and discussion related to the third planning objective.

Much of the information and discussion provided by the Company in the IDP Report related to the second planning objective are also applicable to the third planning objective. The Company's description of its Advanced Grid Intelligence and Security initiative (AGIS), of which major components such as AMI and ADMS (among others) were also discussed, provides information and discussion relevant to the third planning objective. The Company explained that:¹⁰

AMI is an integrated system of advanced meters, communications networks, and data management systems that enables two-way communication between utilities' business and operational data systems and customer meters. AMI is a foundational element of the Company's AGIS plan because it provides a central source of information with which many components of an intelligent grid design interact. The system visibility and data delivered by AMI provides customer benefits for reliability and remote connection, and enables greater customer offerings for rates, programs, and services, and enhances utility planning and operational capabilities.

Additionally, the Company explained the following regarding ADMS:¹¹

¹⁰ IDP Report, page 120.

¹¹ IDP Report, page 116.

ADMS is a collection of core functions and applications designed to monitor and control the entire electric distribution network efficiently and reliably. ADMS will provide an integrated operating and decision support system to assist control center operators, field personnel, and engineers. ADMS will allow the Company to monitor, control, and optimize the electric distribution system.

The Company also discussed how many of components of the AGIS plans (including AMI and ADMS) will help improve the existing customer platform 'MyAccount':¹²

AMI and FAN will also improve existing MyAccount information to provide more personalized insights to help customers understand how and where energy is being used and provide ways to help them save money. These foundational investments will also allow us to advance our technical abilities to deliver reliable, safe, and resilient energy that customers value and depend upon. As an example, FLISR and ADMS combine to automatically reconfigure the grid to reduce the numbers of customers affected by an outage and provide better information to outage restoration crews to speed up their response or avoid those outages in the first place

Last, the Company also discussed how its planned investments in distribution analytics software will help improve its existing customer portal, My Account, which is integrated with the Company's Customer Resource System (CRS) and Meter Data Management System (MDMS):¹³

Data Analytics Software. With the roll-out of AMI, the Company will invest in new distribution analytics software, which is expected to receive data from the AMI headend, MDMS, and the CRS. The software is expected to perform analytics to identify trends for items such as reverse flow, tampering, load side voltage, and temperature. The additional field devices proposed for FLISR will report operational data back to ADMS and potentially enable other data analytics uses.

Once specific data analysis needs are defined, and the new infrastructure is in place, the Company will establish an analytics function, ensure the necessary skillsets are staffed (data experts), develop the analytics software/platform, and integrated the data

¹² IDP Report, page 114.

¹³ IDP Report, pages 152-153 and 170-173.

sources. Looking ahead, we intend to purchase or leverage partnerships for analytics applications. Where feasible and cost effective, these applications will be designed for scalability to integrate additional data sources. As additional data sources are integrated, additional use cases are enabled and will help us to realize further benefits for the Company and our customers.

Data Integration. The analytics capabilities of any software or tool is only as good as the data that feeds it. For that reason, it is important that all the necessary data sources such as AMI and the CRS are connected to the tool. It is also necessary that this data is clean and housed correctly to ensure the results of the analyses are also accurate. The data sources, the data infrastructure, and the data analytics software all need to be integrated to capture all the benefits of the data being collected. Without integration, the data provided from the new field devices cannot be communicated, stored, or analyzed by the analytics applications. In addition, a lack of integration would lead to more manual processes and would not allow for real-time decision-making, all of which will reduce the potential benefits of technologies, like ADMS.

The Department notes that this list is not exhaustive of the items discussed in the IDP Report that relate to the third planning objective. The Department concludes that the Company provided extensive information and discussion of items related to the third planning objective.

4. Planning Objective #4

As noted above, the fourth planning objective of the IDP is designed to ensure optimized utilization of electricity grid assets and resources to minimize total system costs.

The Department analyzed Xcel's IDP Report to see whether the information presented was related to and sufficient in detail to assess the IDP Report's ability to actualize the fourth planning objective. Overall the Department's analysis found that the Company's IDP Report provided information and discussion related to the fourth planning objective.

The Company stated that they have planned their "AGIS investments in a building-block approach, starting with the foundational systems, in alignment with industry standards and frameworks (such as the [U.S. Department of Energy's Next Generation Distribution Platform])

DSPx framework).¹⁴ The Company also stated that they compared their current state systems and process against the DSPx framework, and explained that:¹⁵

Developing “core components” as the foundation for our advanced grid roadmap first and subsequently building on that foundation to enable advanced applications is well aligned with the DSPx framework. Many of these core components are already in place, and others we intend to propose in the near-term will build additional core capabilities to support grid modernization applications.

In the context of the Company’s planning efforts related to distributed energy resources (DERs), it explained the following:¹⁶

The investments that we are currently making in asset health and grid modernization, such as ADMS help to lay the foundation for continued resiliency and reliability. Near-term future planned investments such as AMI and FLISR further cement it, and will allow the Company to gradually respond to increased DER penetration.

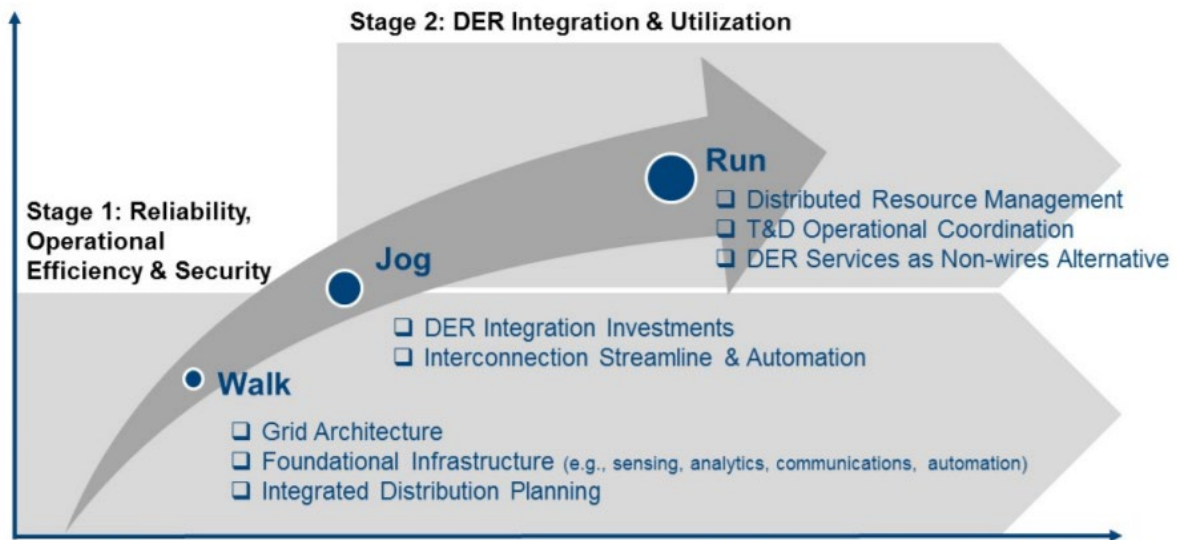
The DOE has also observed that U.S. utilities are in Stage 1 in terms of timing and pace toward a modern distribution grid. As shown in Figure 57 below, DOE also incorporated evolving distribution planning processes and tools into this evolution. Stage 1 also includes improving foundational capabilities such as availability, quantity, and quality of data, which is often achieved by implementing communication systems such as the FAN that is in our near-term advanced grid plans.

¹⁴ IDP Report, Executive Summary, page 7; IDP Report, page 115.

¹⁵ IDP Report, page 147.

¹⁶ IDP Report, pages 180-182.

Figure 57: Timing and Pace Considerations



Source: *Considerations for a Modern Distribution Grid*, Pacific Coast Inter-Staff Collaboration Summit by DOE Office of Electricity Delivery & Energy Reliability (May 24, 2017). See [U.S. DOE DSPx presentation - More Than Smart](#)

Stage 1 is also focused on other foundational infrastructure we are intending to implement, including additional sensing, analytics, and automation capabilities such as the FLISR initiative that is part of our near-term advanced grid plans. According to this concept, Minnesota is with the rest of the industry sitting squarely in Stage 1, with DER integration analysis and planning occurring in Stage 2 after maturing foundational advanced grid capabilities.

Using these concepts as a base, we provide a snapshot of how we contemplate evolving our planning tools and process, applying to our tools, process steps, and actions as sophistication of analysis and processes increase over time as Table 19 below. We note that this Table is an extension of Figure 27 in the System Planning section above, which portrays our present planning tools.

Table 19: Potential Planning Tools Evolution

TOOLS		Current Process Steps					Future Planning Actions				
		Forecast	Risk Analysis	Mitigation Plans	Budget Create	Design and Construct / EDP Memo	Long Range Plans	Interconnection Processing**	Scenario Planning	Integrated Resource Planning	Locational Net Benefit Analysis
Current Tools	Synergi Electric		X	X			X	X			X
	Distribution Asset Analysis*	X	X	-	-	-	-	-			
	MS Excel		X		X		X				
	CYMCAP		X								
	GIS			X			X	X	X		X
	SCADA	X									X
	Workbook (internal)		X	X	X	X					X
	DRIVE***		X	X				X			
Expanded Tools	New Forecasting Tool*	X					X	X	X	X	X
	ADMS	X							X		
	SAP					X					

* *New Forecasting Tool* replaces DAA and adds more functionality

** Planning has larger role in interconnection process

*** Hosting Capacity becomes integrated into planning process

Walk Jog Run

The Department notes that this list is not exhaustive of the items discussed in the IDP Report that relate to the fourth planning objective. The Department concludes that the Company provided extensive information and discussion of items related to the fourth planning objective.

C. TOPIC #3: WHAT, IF ANY, ADJUSTMENTS SHOULD BE MADE TO FUTURE FILING REQUIREMENTS?

Given that the Commission's Notice inquired about the IDP Report's relevance to the planning objectives of the IDP requirements, the Department believes that requiring the Company to provide a discussion relating the content of its IDP reports to the planning discussions would be appropriate. Such a requirement would require the Company to focus specifically on the planning objectives in a more direct way, and one that recognizes the iterative and evolutionary nature of the IDP reports. Additionally, the IDP requirements currently lack an internal, self-reflective mechanism that actualize the iterative and evolutionary intent of the IDP reports. The following items in the recommendation below serve a dual purpose: (1) they actualize the Planning Objectives and require future IDPs to more directly consider them; and (2) they create an internal, self-reflective mechanism that requires the IDP report to consider improvements or changes, thus actualizing the iterative and evolutionary nature intended for the IDP reports. They would also allow for a more qualitative analysis of the Commission's question by all stakeholders.

The Department recommends that the Commission adopt the following requirement for future IDP reports:

IDP reports should include a discussion of how the IDP report relates to the Planning Objectives. This discussion should contain:

- (1) analysis of how the information presented in the IDP report relates to each Planning Objective;
- (2) the location of that information in the IDP report;
- (3) analysis of efforts taken by the Company to improve upon the fulfillment of the Planning Objectives; and
- (4) suggestions as to any refinements to the IDP filing requirements that would enhance Xcel's ability to meet the Planning Objectives.

D. ARE THERE OTHER ISSUES OR CONCERNS RELATED TO THIS MATTER?

In Section VI of the IDP Report, the Company explained that it was not feasible to complete a [Non-Wires Alternatives] analysis for the projects identified by the Company as part of its compliance with IDP Requirement 3.E.1.¹⁷ The Company stated that:¹⁸

...while we put significant time and effort into the screening process and determined the final list of projects, given the very

¹⁷ IDP Report, pages 84-86.

¹⁸ IDP Report, pages 85-86.

compressed timeline for the 2018 IDP, it was not feasible to complete a NWA analysis for all of above projects. While we began work in earnest on many components of the IDP requirements in advance of the Commission's hearing and Order, this was one area that changed throughout the proceeding and was not finalized until just 12 weeks before this IDP was due. NWA analysis is incredibly time consuming and manual – especially as the risks associated with a project increase and several of the above projects have over 15 risks.

Most capacity projects that are budgeted greater than \$2 million are intended to solve larger numbers of risks – this vastly increases the complexity of the problems to solve with a NWA and in turn increases the amount of resources required to conduct the analysis. Projects with fewer capacity risks to solve are more localized and therefore more straightforward.

Accordingly, due to the timeline for this first IDP, we focused on establishing an overall screening process and then performed analysis on the “Install new VKG feeder” project. This is a capacity project to install a new feeder at the Viking substation and is currently budgeted in 2022- 2023. We discuss our analysis below.

With regard to future reports and NWA analysis, we will continue to refine the criteria to identify projects where NWAs have the most potential and will provide the required discussion for those projects. This was a time and resource issue that we were unable to overcome due to the timeline for this initial report.

The Department appreciates this thoughtful discussion and helpful explanation. The Department notes that this explanation seems to have also limited the consideration of non-wires alternatives (NWAs) in relation to IDP Requirement 3.D.2, which details the requirements for Xcel's 5-year Action Plan for distribution system developments and investment in grid modernization.

While the IDP filing requirements has a provision intended to address issues instances in which “a filing requirement is not yet practicable or is currently cost-prohibitive to provide,” Xcel's issue with reporting NWAs seems to be uniquely related to the timing of the 2018 IDP Report deadline. While the Department notes that the Company is not technically in compliance with the NWA reporting requirements, the explanations provided by the Company are reasonable;

therefore, the Department does not object to Xcel's approach to reporting NWAs in its IDP Report.

However, the Department is considering whether a supplemental filing by the Company may provide the information sought by the Commission related to IDP Requirement 3.D.2 and 3.E.1. As noted by the Department and other stakeholders in the development of the IDP filing requirements, NWAs are important to help protect ratepayers, as they could "defer or avoid utility investments in physical infrastructure, guarding against what may be the utility's preference for physical assets to increase its rate base."¹⁹

Given the ratepayer interest in NWAs analysis, the Department requests that the Company provide a response to whether it would be practicable to file a supplemental filing demonstrating compliance with IDP Requirement 3.D.2 and 3.E.1.

III. DEPARTMENT RECOMMENDATIONS

The Department recommends that the Commission accept Xcel's Integrated Distribution Plan Report.

The Department recommends that the Commission require Xcel, in future IDP Reports, to provide the following information:

- (1) an analysis of how the information presented in the IDP report relates to each Planning Objective;
- (2) the location of that information in the IDP report;
- (3) an analysis of efforts taken by the Company to improve upon the fulfillment of the Planning Objectives; and
- (4) suggestions as to any refinements to the IDP filing requirements that would enhance Xcel's ability to meet the Planning Objectives.

The Department also requests that Xcel indicate in reply comments whether it would be practicable to file a supplemental filing demonstrating compliance with IDP Requirement 3.D.2 and 3.E.1.

/jl

¹⁹ Department Reply Comments in Docket No. E002/CI-18-251, dated July 20, 2018, at 30. Also discussed in IREC Initial Comments in Docket No. E002/CI-18-251, dated July 6, 2018, at 20.

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce
Comments**

Docket No. E002/CN-18-251

Dated this 22nd day of February 2019

/s/Sharon Ferguson

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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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