



January 29, 2020

Daniel P. Wolf, Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, MN 55101-2147

Subject: Dakota Electric Association Comments

***In the Matter of Dakota Electric Association's
2019 Integrated Distribution System Plan***

Docket Nos. E-111/CI-18-255 and E-111/M-19-674

Dear Mr. Wolf:

On October 31, 2019, Dakota Electric Association® (Dakota Electric® or Cooperative) filed the Cooperative's inaugural Integrated Distribution Plan (IDP) in Docket No. E-111/M-19-674 in response to filing requirements established by the Minnesota Public Utilities Commission's (Commission or MPUC) February 20, 2019 *Order Adopting Integrated Distribution Plan Filing Requirements* (Order) in Docket No. E-111/CI-18-255.

On December 4, 2019, the Commission issued a *Notice of Comment Period* (Notice) in the above-referenced dockets. This Notice identified the following topics as being open for comment:

- Should the Commission accept or reject Dakota Electric Association's Integrated Distribution Plan (IDP)?
- Does the IDP filed by Dakota Electric Association achieve the planning objectives outlined in the filing requirements approved in the Commission's February 20, 2019 Order?

- What IDP filing requirements provide the most value to the process and why?
- Are there filing requirements that are not informative and/or should be deleted or modified, and why?
- Are there other issues or concerns related to this matter?

Dakota Electric Comments

Dakota Electric submits these comments in response to the topics open for comment listed in the Commission's December 4, 2019 Notice of Comment Period in the above-referenced dockets.

The Commission's December 4 Notice states that the purpose of the Commission's IDP filing requirements is to facilitate a utility's IDP filing that will:

- 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;
- Ensure optimized utilization of electricity grid assets and resources to minimize total system costs; and
- Provide the Commission with the information necessary to understand the utility'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.

Dakota Electric's comments recognize the Commission's stated purpose of IDP filing requirements. For the first two questions asked by the Commission, Dakota Electric will defer to others to answer if they believe that Dakota Electric's filing achieves the planning objectives and should be accepted by the Commission.

1) *Should the Commission accept or reject Dakota Electric Association's Integrated Distribution Plan (IDP)?*

2) *Does the IDP filed by Dakota Electric Association achieve the planning objectives outlined in the filing requirements approved in the Commission's February 20, 2019 Order?*

3) “What IDP filing requirements provide the most value to the process and why?”

Dakota Electric is very interested in learning what portions of Dakota Electric’s report were most useful. Dakota Electric is also very interested in hearing how the data and information will be applied to achieve the stated purposes identified by the Commission. Dakota Electric believes that a better understanding of the different use cases for the information would help with how the information is gathered and reported by the Cooperative in future IDP reports.

4) Are there filing requirements that are not informative and/or should be deleted or modified, and why?

It would be helpful for the development of future IDP reports to have a process where Dakota Electric could engage with Commission staff and/or a stakeholder group to further refine the questions. For example, in Section A, question 29 asks for “*Planned distribution capital project, including drivers for the projects, timeline for improvement, and summary of anticipated changes in historic spending.....*” Dakota Electric understood this question as asking for a listing of all planned distribution capital projects. As discussed in the Dakota Electric IDP report, if Dakota Electric included all capital projects, the list would include many minor dollar capital projects, such as interconnecting a new residential or commercial service. Besides the fact that compiling a list to include all the capital projects would be very time consuming, difficult and produce a list which would not be very useful; Dakota Electric assumed that this was not what was envisioned when the question was written. For the next IDP report, it would be helpful to have a process for the utilities to work with a Commission staff and/or a stakeholder group to refine the questions.

Dakota Electric would like to recommend that before the list of questions is finalized for the next IDP report, the Commission Staff, utilities and stakeholders work together to review and refine the questions. Dakota Electric believes that an interactive face-to-face process of jointly reviewing the questions would help align the data and information provided by the utilities and would result in a more useful IDP report. An interactive, face-to-face discussion among the parties is preferred by Dakota Electric, as

this would be a more effective process for Dakota Electric to understand the issues vs a written comment/ reply comment process which does not allow for an interactive discussion. Of course, a formal written comment process could be completed following the working group efforts, to ensure that all parties are heard. It would be important that during this interactive process, discussion among the group about the use cases for the data is covered. Through this process, it may be found that a question needs to be modified so the resulting data and information better fits the intended use case.

Capital Project Reporting Categories

One area which is difficult for Dakota Electric to report consistently on is the questions in Section A, #26, #28 and #29, which requested capital spending by “driver categories” As commented on within the Dakota Electric IDP report, Dakota Electric does not categorize projects by why the project was started but rather what was constructed. Dakota Electric accounts for the electrical distribution plan by the following general categories.

- A) *New Consumers – costs associated with interconnection of new consumers*
- B) *Main Line construction – costs associated with building and replacing the main line circuits*
- C) *Cable Replacement – costs associated with replacing underground electrical cables.*
- D) *Substations – costs associated with construction and replacement of substation facilities*
- E) *Misc. Distribution Equipment – Costs associated with installation and/or replacement of the following sub-categories*
 - a. *Sectionalizing Equipment*
 - b. *Voltage Regulator Equipment*
 - c. *Capacitor Equipment*
 - d. *Air Break Switches – switches for overhead lines*
 - e. *URD switches – switches for underground cable*
 - f. *Lighting – Security lights and Roadway lighting*

- F) Service Rebuilds – Typically member requested rebuilding of the electrical supply to the member’s home or business.*
- G) Pole and Misc. Replacements – Cost for pole replacements*
- H) Transformer Replacements – Cost to replace transformer due to failure or change in size.*
- I) Advanced Technologies – Costs for installation and replacement of advanced technologies in the following sub-categories*
 - a. Communication (Radio / Fiber)*
 - b. Load Management (Demand Side Management) equipment*
 - c. Distribution Automation*
 - d. DER generation interconnection costs.*

Some of the above categories do align with the requested categories, such as new consumers, but other categories do not align such as service rebuilds which are requested by our membership. Also, some categories, such as metering, are naturally embedded within the above categories and difficult to separate. For example, when a new service is connected the cost of the meter is included in the service connection work order. The crew is dispatched to connect the wires and at the same time set the meter. So, the labor for both operations are done with the same crew and separating the labor costs between two different categories could only be estimated.

For Dakota Electric to accurately report the capital spending by the requested “driver categories” would require significant additional manual handling of each of the individual work orders to estimate the separation of these costs between the requested categories. There are many problems with attempting to keep two separate categories and accounting for the capital projects.

- 1) The requested driver categories are not exclusive and many individual work orders could be considered for multiple driver categories. For example, old underground cable where it is failing due to age and is replaced with a large size wire. Is this age related, or system expansion, or reliability?
- 2) After the capital project is constructed, the reason why it was initiated can be forgotten. Also, the person who initiated the project will not be the same person

who is handling the close-out of the work order, so classification would be problematic. To accurately account for projects by causation would require each work order to be classified when it was created, and a separate accounting process would need to be created and operated in parallel with the current accounting process. This would require many system software modifications and would be very costly.

Dakota Electric recommends that, for future Dakota Electric IDP reports, the categories be refined to better align with the existing typical utility categories shown above. Also, it would be helpful to have discussion as to which types of projects should be allocated to which of the reporting categories, to help provide more consistency within the reporting process.

5) *Are there other issues or concerns related to this matter?*

Dakota Electric is concerned about the large amount of effort required to gather the information requested and to produce the IDP report. As was discussed above, some of the questions required Dakota Electric to gather data into categories which are not tracked nor maintained by the Cooperative, while, other questions asked for future forecasting and analysis for which Dakota Electric does not have information available. Senior engineering staff was required to develop the data and to produce the report. It is important to note that their labor was redirected from other important projects such as the Advanced Grid Infrastructure (AGi) project and DER interconnection standard development in order to produce this IDP report. In addition, Dakota Electric also relied on substantial consulting assistance. Dakota Electric asks that consideration is given to the amount of effort required to produce the data and information when questions are created for future IDP reports.

Conclusion

Dakota Electric looks forward to comments from interested parties and continuing refinement of this, and future, Integrated Distribution Plans.

Sincerely,

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Certificate of Service

I, Cherry Jordan, hereby certify that I have this day served copies of the attached document to those on the following service list by e-filing, personal service, or by causing to be placed in the U.S. mail at Farmington, Minnesota.

Docket Nos. *E-111/CI-18-255 and E-111/M-19-674*

Dated this 29th day of January 2020

/s/ Cherry Jordan

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Joyce	Peppin	joyce@mrea.org	Minnesota Rural Electric Association	11640 73rd Ave N Maple Grove, MN 55369	Electronic Service	No	OFF_SL_18-255_Official
Mary Beth	Peranteau	mperanteau@wheelerlaw.com	Wheeler Van Sickle & Anderson SC	44 E. Mifflin Street, 10th Floor Madison, WI 53703	Electronic Service	No	OFF_SL_18-255_Official
Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_18-255_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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David G.	Prazak	dprazak@otpc.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_18-255_Official
Gregory	Randa	granda@lakecountrypower.com	Lake Country Power	26039 Bear Ridge Drive Cohasset, MN 55721	Electronic Service	No	OFF_SL_18-255_Official
Mark	Rathbun	mrathbun@greenergy.com	Great River Energy	12300 Elm Creek Blvd Maple Grove, MN 55369	Electronic Service	No	OFF_SL_18-255_Official
Michael	Reinertson	michael.reinertson@avanteenergy.com	Avant Energy	220 S. Sixth St. Ste 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_18-255_Official
John C.	Reinhardt	N/A	Laura A. Reinhardt	3552 26th Ave S Minneapolis, MN 55406	Paper Service	No	OFF_SL_18-255_Official
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_18-255_Official
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_18-255_Official
Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative	P.O. Box 227 Madison, SD 57042	Electronic Service	No	OFF_SL_18-255_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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David	Shaffer	shaff081@gmail.com	Minnesota Solar Energy Industries Project	1005 Fairmount Ave Saint Paul, MN 55105	Electronic Service	No	OFF_SL_18-255_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Anne	Smart	anne.smart@chargepoint.com	ChargePoint, Inc.	254 E Hacienda Ave Campbell, CA 95008	Electronic Service	No	OFF_SL_18-255_Official
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Ken	Smith	ken.smith@evergreenenergy.com	Ever Green Energy	305 Saint Peter St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_18-255_Official
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	OFF_SL_18-255_Official
Joshua	Smith	joshua.smith@sierraclub.org		85 Second St FL 2 San Francisco, California 94105	Electronic Service	No	OFF_SL_18-255_Official
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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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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Jessica	Burdette	jessica.burdette@state.mn.us	Department of Commerce	85 7th Place East Suite 500 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-674_M-19-674
Jason	Burwen	j.burwen@energystorage.org	Energy Storage Association	1155 15th St NW, Ste 500 Washington, DC 20005	Electronic Service	No	OFF_SL_19-674_M-19-674
LORI	CLOBES	lclobes@mienergy.coop	MiEnergy Cooperative	31110 COOPERATIVE WAY PO BOX 626 RUSHFORD, MN 55971	Electronic Service	No	OFF_SL_19-674_M-19-674
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Kenneth A.	Colburn	kcolburn@symbioticstrategies.com	Symbiotic Strategies, LLC	26 Winton Road Meredith, NH 32535413	Electronic Service	No	OFF_SL_19-674_M-19-674
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1800 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-674_M-19-674
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Carlton	Doyle Fontaine	carlton.doyle.fontaine@senate.mn	MN Senate	75 Rev Dr Martin Luther King Jr Blvd Room G-17 St Paul, MN 55155	Electronic Service	No	OFF_SL_19-674_M-19-674
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Bob	Eleff	bob.eleff@house.mn	Regulated Industries Cmte	100 Rev Dr Martin Luther King Jr Blvd Room 600 St. Paul, MN 55155	Electronic Service	No	OFF_SL_19-674_M-19-674
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Oncu	Er	oncu.er@avantenergy.com	Avant Energy, Agent for MMPA	220 S. Sixth St. Ste. 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-674_M-19-674

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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Jon	Kramer	sundialjon@gmail.com	Sundial Solar	3209 W 76th St Edina, MN 55435	Electronic Service	No	OFF_SL_19-674_M-19-674
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Michael	Krikava	mkrikava@briggs.com	Briggs And Morgan, P.A.	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-674_M-19-674
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Benjamin	Lowe	N/A	Alevo USA Inc.	101 S Stratford Rd Ste 210 Winston Salem, NC 27107-4224	Paper Service	No	OFF_SL_19-674_M-19-674
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Samuel	Mason	smason@beltramelectric.com	Beltrami Electric Cooperative, Inc.	4111 Technology Dr. NW PO Box 488 Bemidji, MN 56619-0488	Electronic Service	No	OFF_SL_19-674_M-19-674
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John	McWilliams	John.McWilliams@DairylandPower.com	Dairyland Power Cooperative	3200 East Ave SPO Box 817 La Crosse, WI 54601-7227	Electronic Service	No	OFF_SL_19-674_M-19-674
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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