

April 10, 2023

Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, Minnesota 55101-2147

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**  
Docket No. Docket No. E999/CI-22-600

Dear Mr. Seuffert:

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

In the Matter of a Commission Investigation into the Potential Role of Third-Party Aggregation of Retail Customers.

The Department recommends the Commission **not permit third-party aggregators of retail customers to bid demand response into organized markets and take no other action**. The Department is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ STEVE RAKOW  
Analyst Coordinator

SR/ar  
Attachment



## Before the Minnesota Public Utilities Commission

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### Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. E999/CI-22-600

#### I. INTRODUCTION

On February 1, 2021, Northern States Power Company d/b/a Xcel Energy (Xcel) filed a petition for approval of four new load flexibility pilot programs in Docket No. E002/M-21-101. The petition stated that the pilot programs were intended to study customer interest in various DR offerings and the associated costs, benefits, and grid impacts of customer participation in DR programs.

On March 15, 2022, the Minnesota Public Utilities Commission (Commission) issued its *Order Approving Modified Pilots and Demonstration Projects, Authorizing Deferred Accounting, and Taking Other Action* (Pilot Order) in Docket Nos. E002/M-21-101 and E002/M-17-401. At point 3 the Pilot Order authorized the Commission's Executive Secretary to request comment on various issues related to aggregators of retail customers (ARC). Finally, the Pilot Order stated "This order is not a broad authorization of third-party aggregation of demand response in Minnesota, nor does it predetermine any future Commission action."

On December 9, 2022, the Commission issued its *Notice of Comment Period* (Notice) in this proceeding. The Notice stated that the following topics are open for comment:

1. Should the Commission permit ARCs to bid DR into organized markets?
2. Should the Commission require rate-regulated electric utilities to create tariffs allowing third party aggregators to participate in utility DR programs?
3. Should the Commission verify or certify ARCs for DR or distributed energy resources before they are permitted to operate, and if so, how?
4. Are any additional consumer protections necessary if ARCs are permitted to operate?

The Notice also clarified that the Commission previously addressed issues relating to the aggregation of DR in relation to FERC Order 719 and 719-A in Docket No. E999/CI-09-1449.

On March 14, 2023 comments were filed by numerous parties:

1. Advanced Energy Management Alliance and Enerwise Global Technologies, LLC d/b/a CPower;
2. Armada Power, LLC;
3. Clean Energy Economy Minnesota;
4. Dakota Electric Association;
5. Minnesota Department of Commerce, Division of Energy Resources (Department);
6. Great River Energy;

7. Low-Income Consumer and Worker Advocates<sup>1</sup>;
8. Minnesota Large Industrial Group;
9. Minnesota Power;
10. Minnesota Solar Energy Industries Association;
11. Otter Tail Power Company;
12. The R Street Institute;
13. Recurve Analytics, Inc.;
14. RMI, founded as Rocky Mountain Institute, and its Virtual Power Plant Partnership (RMI/VP3);
15. Sierra Club and the Union of Concerned Scientists on behalf of their members in Minnesota (SC/UCS);
16. Sunrun Inc.;
17. SwitchDin;
18. Voltus, Inc. (Voltus);
19. Walmart Inc.; and
20. Xcel.

Below are the reply comments of the Department. Due to the number and length of the comments and the number of other proceedings ongoing at the same time, the Department's reply comments focus on only one issue raised in three comments.

## **II. DEPARTMENT ANALYSIS**

### *A. LEGAL ISSUES*

Whether to allow third party aggregators of demand response to bid into organized markets and, if so, how such entities will operate and be regulated potentially presents a number of novel legal questions for which there are not necessarily clear answers. The Department agrees with those commenting parties who have concluded that ARCs would not be subject to regulation as utilities, for reasons discussed in more detail in the Department's opening comments. The Department does not agree with the SC/UCS that, unless ARCs are public utilities, the Commission has no jurisdiction over them.

First, as the Department noted in its initial comments, to the extent that an ARC enters into a relationship with a public utility, the terms of that relationship would be controlled by the utility's tariff, over which the Commission would plainly have jurisdiction. This is the approach that the Commission has chosen to follow thus far and, in doing so, is acting well within the scope of its jurisdiction.

Second, as the wide variety of comments that have already been provided in this docket make clear, ARCs can take many different forms. An ARC's operations could potentially involve many different

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<sup>1</sup> This group's comment was signed by: Legal Services Advocacy Project; Energy CENTS Coalition; International Union of Operating Engineers Local 49; North Central States Regional Council of Carpenters; and LIUNA Minnesota & North Dakota.

structures, business models, and technologies. To the extent that an ARC operates wholly independent of any relationship with a regulated utility (i.e., outside of a tariff), the Commission's jurisdiction may depend on specific details of how the ARC will operate and how it may implicate existing regulatory structures.

#### *B. XCEL'S PILOT PROJECT*

Xcel stated that:

We believe that it would be premature for a state policy shift requiring rate-regulated electric utilities to allow ARCs to participate in their demand response programs now instead of waiting for the Company to provide synthesized report data and lessons learned back to the Commission.

To the extent that the Commission is asking if the best method for ARC participation in the demand-response programs of rate-regulated electric utilities is through tariffs, we note that the Commission has identified a role for third-party participants on a pilot basis, and that it did so understanding the protections that a tariffed program structure provides to customers. We see no reason to alter that process at this time

The Department agrees with Xcel that ARCs could play a role in developing DR resources, that the Commission has approved a pilot project to test ARC participation<sup>2</sup>, and that the Commission should not require Xcel to create tariffs allowing third party aggregators to participate in Xcel's DR programs until information from Xcel's pilot program is available.

#### *C. MISO TARIFF*

Voltus states that:

In addition to the double counting issue through double market registration that MISO will review, there is the issue of conflicting resource use between consumers who participate with ARCs in the MISO wholesale market and that customer also participating in a retail interruptible program used by the utility for distribution related issues. The Minnesota PUC, as the Relevant Electric Retail Regulatory Authority (RERRA), will have 10 Business Days under MISO's tariffs to determine whether a customer is participating in a conflicting retail program before MISO approves an Aggregation application.

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<sup>2</sup> As noted above Xcel's Peak Flex Credit pilot was approved by the Commission's Pilot Order; Xcel launched the Peak Flex Credit pilot in December, 2022.

At this time, it is not clear to the Department how the Commission could respond in within 10 Business Days with the determination discussed by Voltus. This is an example of how significant processes would have to be worked out before a final decision ARCs to operate could be made.

### **III. DEPARTMENT RECOMMENDATION**

The Department recommends that the Commission:

1. not permit ARCs to bid DR into organized markets;
1. take no action regarding tariffs that allow ARCs to participate in utility DR programs at this time;  
and
2. take no action regarding verifying or certifying ARCs for DR at this time.

## **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. E999/CI-22-600**

Dated this **10<sup>th</sup>** day of **April 2023**

**/s/Sharon Ferguson**

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