

February 19, 2020

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101

RE: **Reply Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E111/M-19-674

Dear Mr. Seuffert:

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

Dakota Electric Association's 2019 Integrated Distribution Plan.

As discussed in the attached reply comments, the Department provides its response to the Minnesota Public Utilities Commission's (Commission) December 4, 2019 *Notice of Comment Period on Dakota Electric Association's 2019 Integrated Distribution Plan*.

At this time, the Department recommends that the Commission accept Dakota Electric Association's 2019 Integrated Distribution Plan, and offers certain amendments to the Commission's *Minnesota Integrated Distribution Planning Requirements for Dakota Electric Association*.

Sincerely,

/s/ MATTHEW LANDI
Rates Analyst

ML/ja
Attachment



Before the Minnesota Public Utilities Commission

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

Docket No. E111/M-19-674

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 Modernization docket). The Grid Modernization docket was discussed at the Commission's April 19, 2018 agenda meeting, in which the Commission reviewed the draft Integrated Distribution Plan (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 February 20, 2019, the Commission issued its *Order Adopting Integrated Distribution Plan Filing Requirements* in Docket No. E017/CI-18-253, E015/M-18-254, and E111/CI-18-255 (the Order) establishing IDP filing requirements and deadlines for Otter Tail Power Company, Minnesota Power, and Dakota Electric Association (DEA, or the Company), respectively. The Order directed the utilities to file their first IDPs by November 1, 2019.

As required, DEA subsequently filed its first IDP in this proceeding. On December 4, 2019, the Commission issued a *Notice of Comment Period* (Notice). The notice reaffirmed the purpose of the Commission's Integrated Distribution Plan (IDP) filing requirements:

- Maintain and enhance the safety, security, reliability, and resilience of the electric 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 the specific investments, and a comprehensive analysis of ratepayer cost and value.

The Commission's Notice also included the following topics open for comment:

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 in the filing requirements approved in the Commission's February 20, 2019 Order?
3. What IDP filing requirements provided the most value to the process and why?
4. Are there filing requirements that are not informative and/or should be deleted or modified, and why?
5. Are there other issues or concerns related to this matter?

On or before January 29, 2020, the Minnesota Department of Commerce, Division of Energy Resources (Department), Clean Energy Economy Minnesota (CEEM), Rakon Energy LLC, and the Company submitted Initial Comments in this proceeding.

II. DEPARTMENT ANALYSIS

A. APPROVAL OF THE 2019 IDP REPORT

The Department responds to Initial Comments from CEEM regarding an issue that is important to address: that "approval" of DEA's 2019 IDP is not a finding of reasonableness of any proposed system modifications or investments nor a determination of prudence for any proposals contained within the IDP.¹

The Department agrees with CEEM that the Commission's approval or acceptance of DEA's IDP should not be understood as pre-approval nor an advanced determination of prudence for any proposals contained within DEA's IDP. Such proposals require detailed review on a case-by-case basis before those determinations can be made.

CEEM also encouraged the Commission "to use the IDP process to create communities of practice" so that the stakeholder community, the Commission, and utilities "all learn with and from each other as IDP evolves."² The Department agrees that this could be a worthwhile goal, as the IDP process has the potential to: address the informational asymmetry between stakeholders, regulators and utilities; enable more transparent planning processes and expenditures of ratepayer funds; and help all involved learn best practices and share lessons learned.

¹ [CEEM Initial Comments](#), dated January 29, 2020, at 3.

² CEEM Initial Comments, at 6.

B. PROPOSED MODIFICATIONS TO FUTURE IDP REPORTS

In DEA's Initial Comments on its IDP, the Company indicated that 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."³ (The Department understands "questions" as used by DEA to be the IDP requirements.) Further, the Company stated that "an interactive face-to-face process of jointly reviewing the questions would help align the data and information provided by utilities and would result in a more useful IDP report" and argued that 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."⁴ DEA noted that, if implemented, the interactive process would necessarily be followed by a formal written comment process to ensure that all stakeholders' input is considered by the Commission.

The Department may support such an effort, but stresses that an administrative record would have to be developed given the expectation that the less formal interactive process would lead to proposals for material and substantive changes to any IDP requirements.

Additionally, DEA explained that data information gathering for Capital Project Reporting Categories (Sections 3.A.26, 28, and 29) was exceedingly difficult due to the Company's internal system: DEA "does not categorize projects by why the project was started but rather what was constructed."⁵ DEA explained the general categories used internally, and indicated that the categories of information required by the IDP and the categories of information used by the Company are misaligned.⁶ Further, DEA explained that reporting its capital spending per the IDP requirements would "require significant additional manual handling of each of the individual work orders to estimate the separation of these costs between the requested categories."⁷ As a result, consistent reporting under the existing categories will be challenging and require extensive effort.

DEA's IDP Report also explained that tracking its capital expenses in line with Sections 3.A.26, 28, and 29 is a difficult exercise.⁸

As discussed at the Commission hearings and within Dakota Electric's filed comments, Dakota Electric does not track construction projects using the categories requested. A code is applied to the construction work order which corresponds to the type of construction activity. For example, projects associated with new services are part of the 100 series codes, new or modification to main lines are 200 and 300 series and substation work is the 700 series. Dakota Electric uses these classifications for budgeting and tracking the capital construction projects.

³ [Dakota Electric Association Initial Comments](#), dated January 29, 2020, at 3.

⁴ DEA Initial Comments, at 3-4.

⁵ DEA Initial Comments, at 4.

⁶ DEA Initial Comments, at 5.

⁷ DEA Initial Comments, at 5-6.

⁸ [Dakota Electric Association 2019 IDP Report](#), at 38-39.

...

The allocation of the total capital dollars to the requested categories for each of the years is very difficult. The coding system, which Dakota Electric uses for budgeting and tracking capital construction, tracks what was constructed rather than why it was constructed. Converting what was constructed, especially for historical construction projects, into categories which are based upon why each project was constructed, is a very subjective process.

DEA recommended that for future IDP reports, the categories be refined to better align with categories currently in use internally, as follows:⁹

- 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.

⁹ DEA Initial Comments, at 4-6.

The Department reviewed Dakota Electric's comments in Docket No. E111/CI-18-255 at the time the IDP requirements were under consideration for finalization. Dakota Electric specifically requested that the "Financial Data" section of the IDP requirements (Section 3.A.26) be revised to comport with its existing, internal system of accounting:¹⁰

- Age-Related Replacements and Asset Renewal
- System Capacity Expansion (Capacity Driven)
- System Capacity Expansion (Reliability Driven)
- Projects to Support New Members (includes metering, transformers and wires)
- System Projects driven by governmental projects (road moves)
- Grid Modernization (advanced technologies)

The Commission approved DEA's requested categorization for use for the 2019 IDP, but required the use of Section 3.A.26 categorizations, which are as follows, for future IDPs:

- a. Age-Related Replacements and Asset Renewal
- b. System Expansion or Upgrades for Capacity
- c. System Expansion or Upgrades for Reliability and Power Quality
- d. New Customer Projects and New Revenue
- e. Grid Modernization and Pilot Projects
- f. Projects related to local (or other) government-requirements (road-relocations, etc.)
- g. Metering
- h. Other

The Department notes that the information that DEA provided was required in accordance with its own recommendation, and is very similar to the categories required going forward. The Department notes that the Company has the option of completing the four-part analysis required by the IDP filing requirements for any filing requirement that is "not yet practicable or is currently cost-prohibitive to provide."¹¹ While it may have turned out that, in practice, providing the information that comports with its own recommendation may be difficult, DEA did not show that providing the information required by those sections in future reports is not yet practicable nor cost-prohibitive. However, it appears that DEA is suggesting that the categorizations be revised through the interactive face-to-face process noted above, rather than determined through this written record. As previously noted, the Department is not opposed to participating in discussions held to refine the IDP reporting

¹⁰ [Dakota Electric Association Initial Comments](#), Docket No. E111/CI-18-255, dated September 7, 2018, at 8.

¹¹ See Dakota Electric Association IDP Requirements, "Planning Objectives". DEA must show 1) why the information is not yet practicable or is cost-prohibitive, 2) how the information could be obtained, at what cost, and timeframe, 3) what the benefits/limitations of the data relate to achieving the planning objectives, and 4) what alternative information could be provided.

requirements, assuming a written record will form the basis for any changes to the current Commission-approved reporting requirements.

C. IDP REQUIREMENTS 3.D.1 AND 3.D.2

In the Department's initial comments, the Department recommended that the Commission merge IDP Requirements 3.D.1 and 3.D.2 (Recommendation 3). Commission staff pointed out in its February 14, 2020 Staff Briefing Papers for Minnesota Power's 2019 IDP Report (Docket No. E015/M-19-684) that the Executive Secretary merged those two requirements for Otter Tail Power Company's, Minnesota Power's and DEA's IDP filing requirements, as attached to the Commission's February 20, 2019 Order in Docket Nos. E017/CI-18-253, E015/CI-18-254 and E111/CI-18-255, respectively.¹² Accordingly, the Department withdraws this recommendation.

D. OTHER ISSUES OR CONCERNS

In review of DEA's, Otter Tail Power's, and Minnesota Power's IDP Requirements, the Department notes that there is a minor error under the "Planning Objectives" section:

Commission review of **annual** distribution system plans are not meant to preclude flexibility for Dakota Electric to respond to dynamic changes and on-going necessary system improvements to the distribution system; nor is it a prudency determination of any proposed system modifications or investments. (emphasis added)

The current filing cadence of the IDP reports is a biennial filing, and notes that may or may not change in the future. The Department recommends that the Executive Secretary delete the word "annual" from the "Planning Objectives" section for the three utilities' IDP Requirements.

III. DEPARTMENT RECOMMENDATIONS

The Department appreciates the opportunity to comment on DEA's 2019 IDP. The Department recommends that the Commission accept DEA's 2019 IDP, and offers the following additional recommendations.

The Department's recommended text below should be understood to supersede previous recommendations in Docket No. E015/M-19-684 and E017/M-19-693 (with the exception of references to the specific utility) in order to ensure consistency between the specific text of the filing requirements.

¹² [Staff Briefing Papers](#), Docket No. E015/CI-19-684, dated February 14, 2020, at 16.

The Department makes the following recommendations:

- **The Department recommends that the Commission require Dakota Electric Association to discuss in future filings how the IDP meets the Commission’s Planning Objectives, including:**
 - A. **An analysis of how the information presented in the IDP relates to each Planning Objective,**
 - B. **The location in the IDP where each Planning Objective is discussed,**
 - C. **Analysis of efforts taken by the Company to improve upon the fulfillment of the Planning Objectives, and**
 - D. **Suggestions as to any refinements to the IDP filing requirements that would enhance Dakota Electric Association’s ability to meet the Planning Objectives.**

- **The Department recommends that the Commission amend IDP Requirement 3.D.2 (xi) of Dakota Electric Association’s IDP Requirements to read as follows:**

For each grid modernization project in its 5-year Action Plan, require Dakota Electric Association to provide a cost-benefit analysis based on the best information it has at the time and include a discussion of non-quantifiable benefits. Dakota Electric Association shall provide all information to support its analysis.

- **The Department recommends that the Commission amend the following paragraph of DEA’s IDP Requirements as follows:**

Commission review of ~~annual~~ distribution system plans are not meant to preclude flexibility for Dakota Electric to respond to dynamic changes and on-going necessary system improvements to the distribution system, nor is it a prudency determination of any proposed system modifications or investments.

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
Reply Comments**

Docket No. E111/M-19-674

Dated this **19th** day of **February 2020**

/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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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_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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Generic Notice	Residential Utilities Division	residential.utilities@ag.stat e.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_19-674_19-674
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_19-674_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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