

Revised Decision Options

Dakota Electric Association Integrated Distribution Plan Docket E111/M-23-420

- Dakota and the Department sent preferred decision options. Where there are changes in support from the briefing papers Staff has noted it in (red underline)
- New decision options are also included in red underline and prefaced by the organization sponsoring them, for example “DEA 3”
- Staff has listed where participants are opposed to a decision option. If a non-utility participant is not listed under support or oppose, they took no position on the issue. In some instances, Staff has provided additional context when a participant took no position.
- Submissions received by participants are attached to the end of the revised decision options and contain additional context on participant preferences.
- Dakota also requested the Commission issue a list of all IDP filing requirements with its Order – Staff confirms that the Association’s filing requirements will be included in the Order.

Summary of Positions

DO	Dakota	Department
1	Support	Support
2	Opposed	Support
3	See DEA 3	Support
DEA 3	Support	No Position
4	Opposed	Support
5	Opposed	Support
6	Opposed	Support
7	Opposed	Opposed
8	See DEA 8	Support
DEA 8	No Position	No Position
9	Opposed	Support
10	No Position	Opposed
11	No Position	See DOC 12
12	Support	See DOC 12
DOC 12	No Position	Support

Decision Options

IDP Acceptance

The Commission should select DO 1

1. Accept Dakota Electric Association's 2023 IDP Report as in compliance with IDP reporting requirements. Acceptance of the 2023 IDP has no bearing on prudence nor certification under Minn. Stat. § 216B.2425, subd. 3. (Dakota, Department)

Modifications for Future IDPs

The Commission may select any combination of DO 2-5, or none of the options.

2. Direct Dakota Electric Association to provide more complete quantification of the benefits and costs of all grid modernization projects anticipated to begin within a five-year interval, consistent with the IDP filing requirements, in future IDPs. (Department)
Opposed: Dakota Electric
3. Direct Dakota Electric Association to include a formal Action Plan detailing the anticipated timing of grid modernization projects over the next five years in future IDPs. (Department)

OR

DEA 3 Direct Dakota Electric Association to include an ~~an formal~~ Action Plan ~~detailing showing~~ the anticipated timing of grid modernization projects over the next five years in future IDPs. (Dakota – does not oppose with this modification)

4. Direct Dakota Electric Association to provide in its next IDP a more detailed assessment of NWA suitability for qualifying opportunities. This assessment must be rigorous and quantitative to the extent possible rather than simply relying on expert judgement. The Cooperative shall file records of all data considered and analyses undertaken (i.e., at the screening stage) to determine whether a detailed NWA analysis is suitable. For all needs for which a detailed analysis is undertaken, the Cooperative shall provide documentation of this analysis in its IDP. (Department)
Opposed: Dakota Electric
5. Direct Dakota Electric Association to provide in its next IDP clarification about which categories of capital projects warrant detailed discussions of NWA viability and/or NWA analysis, and: (Department)
 - a. Clarify that filing requirement E.1 applies to all project purposes

OR

- b. Clarify that filing requirement E.1 applies only to the following project purposes:
[identify the project purposes subject to this requirement]

Opposed: Dakota Electric unless there is additional clarification

*The Commission may select DO 6 **AND/OR** 7, **OR** DO 8, **OR** DEA 8 or none of the options. These decision options are explained the Joint Briefing Papers.*

6. Direct Dakota Electric to develop a suite of metrics to track resiliency, including SAIDI with MEDs and SAIFI with MEDs, and other metrics to the extent warranted with its 2025 IDP. (Department)

Opposed: Dakota Electric

AND/OR

7. Direct Dakota Electric Association to provide a proposal for measuring the capacity, reliability, ratepayer impacts, and equity impacts of its distribution grid investments in its next IDP. This proposal should specifically address the level of granularity at which Dakota Electric Association will evaluate these impacts for each budget category, indicating for each category whether Dakota Electric Association plans to measure these impacts at the level of the budget category, program, project, or at some other level of resolution, or not at all, and specifically accounting for the impact of any expected changes to IDP budget categories. (Department – now supports DO 8)

Opposed: Dakota Electric

OR

8. Delegate authority to the Executive Secretary work with Dakota Electric Association and stakeholders to discuss metrics reported across distribution dockets, and delegate authority to the Executive Secretary to approve via notice a stakeholder agreement on metrics reporting if one is reached. At minimum, the proposal and metrics shall include the following components:

- a. Reliability metrics such as SAIDI, SAIFI, CAIDI, CEMI, and CELI
- b. Distribution spending by IDP budget categories
- c. Whether there is available hosting capacity for generation or load at the primary system level
- d. Demographic data including race and income
- e. Installed DERs, ECO rebates, DR customers enrolled in programs
- f. Metrics reported at a feeder and/or census block group level

(Staff, Department)

OR

DEA 8 Delegate authority to the Executive Secretary work with Dakota Electric Association and stakeholders to discuss metrics reported across distribution dockets, and delegate authority to the Executive Secretary to approve via notice a stakeholder agreement on metrics reporting if one is reached. ~~At minimum, the proposal and metrics shall include the following components:~~

- ~~a. Reliability metrics such as SAIDI, SAIFI, CAIDI, CEMI, and CELI~~
- ~~b. Distribution spending by IDP budget categories~~
- ~~c. Whether there is available hosting capacity for generation or load at the primary system level~~

~~d. Demographic data including race and income~~
~~e. Installed DERs, ECO rebates, DR customers enrolled in programs~~
~~f. Metrics reported at a feeder and/or census block group level~~
 (Staff interpretation of Dakota Electric position from preferred DOs, Dakota would not oppose with these modifications)

The Commission may select either DO 9 OR DO 10, or neither. These decision options are explained the Joint Briefing Papers

9. Order Dakota Electric Association to file a supplemental filing within [180 days] of the Commission's Order in this docket that proposes a plan to accelerate beneficial electrification for its customers, including a discussion of how to incentivize dual fuel adoption for space heating and electrification of water heating, and provide forecasts of expected grid impacts of the same. (Department)

Opposed: Dakota Electric

OR

10. Delegate Authority to the Executive Secretary to work with Dakota Electric Association, the Department, and stakeholders to modify the IDP filing requirements to include discussions of the impacts of electrification where appropriate. Delegate authority to approve via notice a stakeholder agreement on amended filing requirements if one is reached. (Staff, Dakota does not oppose)

Opposed: Department

The Commission may select DO 11, DO 12, DOC 12, or none of the options. These decision options are explained the Joint Briefing Papers.

11. Delegate authority to the Executive Secretary to work with Dakota Electric Association and stakeholders on ways to modify the IDP budget categories to allow for comparisons between utilities and comparison of historic to forecasted data. Delegate authority to the Executive Secretary to approve via notice a stakeholder agreement on amended filing requirements if one is reached. (Staff, Dakota does not oppose)

For Department position See DOC 12

OR

12. Modify Dakota Electric Association's IDP filing requirements to amend requirement 3.A.26, 3.A.28, and 3.A.29 to remove the requirement that financial information be reported in IDP-specific categories as follows: (Dakota preferred)

For Department position See DOC 12

3.A.26 Historical distribution system spending for the past 5 years, ~~in each category. Information shall be reflected in categories consistent with the Associations' cost recovery proceedings.~~
~~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~~
- ~~g. Metering~~
- ~~h. Other~~
- ~~i. Electric Vehicle Programs~~
 - ~~1) Capital Costs~~
 - ~~2) O&M Costs~~
 - ~~3) Marketing and Communications~~
 - ~~4) Other (provide explanation of what is in "other")~~

~~The Company may provide in the IDP any 2018 or earlier data in the following rate case categories:~~

- ~~a. Asset Health~~
- ~~b. New Business~~
- ~~c. Capacity~~
- ~~d. Fleet, Tools, and Equipment~~
- ~~e. Grid Modernization~~

For each category, provide a description of what items and investments are included.

- 3.A.28 Projected distribution system spending for 5 years into the future ~~for the categories listed above in categories consistent with the Association's cost recovery proceedings.~~ itemizing any non-traditional distribution projects.
- 3.A.29 Planned distribution capital projects, including drivers for the project, timeline for improvement, summary of anticipated changes in historic spending. Projects shall be reflected in categories consistent with the Association's cost recovery proceedings. ~~Driver categories should include:~~
- ~~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~~
 - ~~g. Metering~~
 - ~~h. Other~~
 - ~~i. Electric Vehicle Programs~~
 - ~~1) Capital Costs~~
 - ~~2) O&M Costs~~
 - ~~3) Marketing and Communications~~

~~4) Other (provide explanation of what is in "other")~~

DOC 12 Require Dakota Electric Association to file both the IDP budget categories and the categories of the Association's cost recovery proceedings in its 2025 IDP. (Staff interpretation of Department alternative to DO 11 and 12)

Dakota Electric Association - Preferred Decision Options

Decision Option 1—**Support**

Decision Option 2—**Oppose**

Decision Option 3—**Do not oppose** if the following modification made:

Direct Dakota Electric Association to include an an formal Action Plan detailling showing the anticipated timing of grid modernization projects over the next five years in future IDPs.

Decision Option 4—**Oppose**

Decision Option 5—**Oppose** unless there can be additional clarity on this request. I don't have additional discussion or suggestions on wording because I don't fully understand what the Department is requesting.

Decision Option 6—**Oppose**

Decision Option 7—**Oppose**

Decision Option 8—**Do not Oppose stakeholder group** but do have concerns with certain subpoints.

Subpoint A—metrics readily available but note that Commission has exempted DEA from service quality metrics and standards and there haven't been changes/deterioration in DEA service quality since the Commission made this decision

Subpoint C—We have concerns and note that DEA already has its internal DER screening tool in place

Subpoint D—Serious concerns

Subpoint E—Issues if this is anything other than system level (already provided in IDP)

Subpoint F—Serious concerns

Decision Option 9—**Oppose**

Decision Option 10—**Do not oppose**

Decision Option 11—**Do not oppose** (This is preferred between 11 or 12 if the Commission is looking for comparative analysis. DEA would note that there should be acknowledgment that full comparative analysis may be difficult because of unique circumstances of each utility.)

Decision Option 12—**Support** (This option is likely the easier to implement of 11 or 12 but may not be fully what the Commission is looking for if they are interested in more comparative analysis).

New Decision Option 13—To aid in development of our next IDP, DEA will request that the Commission issue its order with a list of all filing requirements (including any modifications) including those from previous IDP Orders

Department of Commerce - Decision Options for Individual Briefing papers for DEA

DAKOTA ELECTRIC ASSOCIATION (DEA) IDP E111/M-23-420	DOC POSITION
1. Accept DEA's 2023 IDP Report as in compliance with IDP reporting requirements. Acceptance of the 2023 IDP has no bearing on prudency nor certification under Minn. Stat. § 216B.2425, subd. 3	Support.
2. Direct Dakota Electric Association to provide more complete quantification of the benefits and costs of all grid modernization projects anticipated to begin within a five-year interval, consistent with the IDP filing requirements, in future IDPs.	Support.
3. Direct Dakota Electric Association to include a formal Action Plan detailing the anticipated timing of grid modernization projects over the next five years in future IDPs.	Support.
4. Direct Dakota Electric Association to provide in its next IDP a more detailed assessment of NWA suitability for qualifying opportunities. This assessment must be rigorous and quantitative to the extent possible rather than simply relying on expert judgement. The Cooperative shall file records of all data considered and analyses undertaken (i.e., at the screening stage) to determine whether a detailed NWA analysis is suitable. For all needs for which a detailed analysis is undertaken, the Cooperative shall provide documentation of this analysis in its IDP.	Support.
5. Direct Dakota Electric Association to provide in its next IDP clarification about which categories of capital projects warrant detailed discussions of NWA viability and/or NWA analysis, and:	Support.
5.A. Clarify that filing requirement E.A applies to all project purposes OR 5.B Clarify that filing requirement E.1 applies only to the following project purposes: [Identify]	Support.
6. Direct Dakota Electric to develop a suite of metrics to track resiliency, including SAIDI with MEDs and SAIFI with MEDs, and other metrics to the extent warranted with its 2025 IDP.	Support.
7. Direct Dakota Electric Association to provide a proposal for measuring the capacity, reliability, ratepayer impacts, and equity impacts of its distribution grid investments in its next IDP. This proposal should specifically address the level of granularity at which Dakota Electric Association will evaluate these impacts for each budget category, indicating for each category whether Dakota Electric Association plans to measure these impacts at the level of the budget category, program, project, or at some other level of resolution, or not at all, and specifically accounting for the impact of any expected changes to IDP budget categories. (The Department)	Oppose. See explanation below in staff alternative decision option below
ALTERNATIVE TO 7. 8. Delegate authority to the Executive Secretary work with Dakota Electric Association and stakeholders to discuss metrics reported across distribution dockets, and delegate authority to the Executive Secretary to approve via notice a stakeholder agreement on metrics reporting if one is reached. At minimum, the proposal and metrics shall include the following components: a. Reliability metrics such as SAIDI, SAIFI, CAIDI, CEMI, & CELI b. Distribution spending by IDP budget categories c. Whether there is available hosting capacity for generation or load at the primary system level. d. Demographic data including race & income. e. Installed DERs, ECO rebates, DR customers enrolled in programs f. Metrics reported at a feeder and/or census block group level	Support. The Department appreciates the opportunity to revise the reporting requirements of all IDPs ahead of the next filing, which is an advantage over our initial proposal. We suggest that the stakeholder process includes all four rate-regulated utilities.

Department of Commerce - Decision Options for Individual Briefing papers for DEA

<p>9. Order Dakota Electric Association to file a supplemental filing within [180 days] of the Commission’s Order in this docket that proposes a plan to accelerate beneficial electrification for its customers, including a discussion of how to incentivize dual fuel adoption for space heating and electrification of water heating, and provide forecasts of expected grid impacts of the same. (</p>	<p>Support.</p>
<p>ALTERNATIVE TO 9. 10. Delegate Authority to the Executive Secretary to work with Dakota Electric Association, the Department, and stakeholders to modify the IDP filing requirements to include discussions of the impacts of electrification where appropriate. Delegate authority to approve via notice a stakeholder agreement on amended filing requirements if one is reached.</p>	<p>Oppose.</p>
<p>11. Delegate authority to the Executive Secretary to work with Dakota Electric Association and stakeholders on ways to modify the IDP budget categories to allow for comparisons between utilities and comparison of historic to forecasted data. Delegate authority to the Executive Secretary to approve via notice a stakeholder agreement on amended filing requirements if one is reached.</p>	<p>Oppose.</p>
<p>ALTERNATIVE TO 11. 12. Modify DEA’s IDP filing requirements to amend requirement 3.A.26, 3.A.28, and 3.A.29 to remove the requirement that financial information be reported in IDP-specific categories as follows: <u>3.A.26</u> Historical distribution system spending for the past 5 years. Information shall be reflected in categories consistent with the Assn’s cost recovery proceedings. For each category, provide a description of what items and investments are included. <u>3.A.28</u> Projected distribution system spending for 5 years into the future in categories consistent with the Assn’s cost recovery proceedings. 3.A.29 Planned distribution capital projects, including drivers for the project, timeline for improvement, summary of anticipated changes in historic spending. Projects shall be reflected in categories consistent with the Association’s cost recovery proceedings.</p>	<p>Support.</p> <p>The Department would support including the IDP-specific budget categories in the 2025 IDP, along with the categories of the Company’s cost recovery proceedings, to address the concerns raised by Staff prompting DO 11.</p>