

April 12, 2024

Mr. Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 East Seventh Place, Suite 350
Saint Paul, MN 55101-2147

RE: DOCKET E002/M-23-452 XCEL 2023 INTEGRATED DISTRIBUTION PLAN

Dear Mr. Seuffert:

The City of Minneapolis (“Minneapolis”) appreciates the opportunity to provide Supplemental Comments on Xcel Energy’s (“Xcel” or “the Company”) 2023 Integrated Distribution Plan (“IDP”). We offer the following recommendations after reviewing the record and speaking with other stakeholders.

Minneapolis continues to recommend that the Commission accept Xcel Energy’s 2023 IDP with modifications. As a supplement to our Initial Comments, we recommend the following:

- Support for Xcel’s proposed stakeholder work to identify a process for cost allocation and proactive upgrades, as long as it is led by a third party, like the Commission or other neutral party. Allow more extensive engagement than two workshops if necessary to achieve optimal results and broader agreement.
- Require Xcel to issue a Request for Information regarding its proposed Non-Wires Alternative (“NWA”) process to ensure the proposed plan is comprehensive and viable for potential responders to an RFP. Given this will be the first NWA project opportunity under the IDP process, this step may be helpful for identifying if there are any modifications that would be beneficial.
- Require Xcel to evaluate feeders for which IVVO is cost-effective under the new Minnesota CB Test and the updated assumptions informed by Public Service Company’s experience with IVVO. The analysis should consider forecasts for EV adoption, building electrification, and distributed generation adoption.
- Support for Fresh Energy’s recommendation to convene stakeholders to refine Xcel’s planned net load methodology for the next IDP so that it better reflects the peak load-reducing impacts of solar if the stakeholder process is led by a neutral third party, such as the Commission.
- With respect to Flexible Interconnection, support the Grid Equity Commenters’ recommendation that the existing Distributed Generation Working Group be a forum in which to have this discussion, and generate agreement on defining this use case and other relevant considerations, which could then be filed in the IDP proceeding.
- With respect to DERMS, support the Grid Equity Commenters’ suggestion that the Commission consider either expand the DGWG scope (and renaming the group) or create a separate Commission-

led working group to address DERMS use cases and implementation, and potentially other cross-proceeding and cross-utility issues, such as cost allocation.

Thank you for consideration of our Supplemental Comments.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "K. W. Havey". The signature is fluid and cursive, with a long horizontal stroke extending from the end.

Kim W. Havey (He/Him)
Division Director
Sustainability, Healthy Homes, and the Environment