



Minneapolis
City of Lakes

**Office of the
City Coordinator**

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June 28, 2013

Burl W. Haar
Executive Secretary
Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, Minnesota 55101

**RE: City of Minneapolis Comments regarding Xcel Energy's Annual Report and
Petition Service Quality Performance including Smart Grid report, Docket
Number E, E002/M-13-255**

Dear Dr. Haar:

The City of Minneapolis is submitting these public comments in response to Xcel Energy's April 1, 2013 filing of their required Electric Annual Service Quality Performance Report. On June 28, 2013 the Minneapolis City Council authorized staff to submit comments.

The decisions made at the Public Utilities Commission and Department of Commerce have substantial impacts on the ability of the City of Minneapolis to meet its Climate Action Plan goals, environmental justice goals, and other environmental and sustainability goals. In addition, the City has a franchise agreement with the Xcel Energy since much of Xcel's infrastructure is situated in the City's right of way. Understandably, a long – term safe, reliable and quality distribution system is necessary to ensuring a livable community within the City and for supporting Xcel's existing customers and growth potential of the City's various customer classes including residential, commercial, and industrial.

The City is still reviewing the annual report but would like to submit these comments at this time:

We concur with the statement of Commission staff in the briefing papers for the MPUC agenda hearing on Xcel Energy's 2010 reliability standards, that the utility should be expected "to continuously improve and not just maintain their system" in order to ensure "that the utility is proactive in their management and steadily improving reliability."¹ In this regard, including Xcel's annual Smart Grid report appears consistent, although more work is needed.

Due to the lack of specificity in the report, we are concerned that Xcel Energy may not be allocating sufficient resources for the ongoing operation and maintenance of the distribution system in the City of Minneapolis. We would like to request a map



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¹ Briefing papers for December 15, 2011 agenda hearing in MPUC Docket No. E002/M-11-293, at page 6.

outlining the four Minnesota work centers in order to better assess the report. Is it correct to assume that all of Minneapolis is located in the Metro West system?

According to a recent report by the Electric Power Research Institute, most electrical outages are due to problems in the local electric distribution system. We assume that, because of the age of the City, many areas of the City are served by some of Xcel Energy's oldest distribution infrastructure, and will require significant investment for ongoing operation and replacement. A 21st century electric system is critical to the City's ability to create jobs and maintain economic vitality within the City, and we expect Xcel Energy to be working toward providing its customers with exactly that.

To that end, it would be beneficial to the City to if the Commission would require Xcel Energy to break out much of the data it provides in its report, at the geographic city level. For example, this would include sharing system improvements/enhancements the utility is planning or has implemented since the last report, as well as breaking out the table on Transmission Level Cause Codes by city.

Ideally, the City of Minneapolis would like quarterly reports to the municipality on system reliability that details service continuity and quality within the municipality.

In addition, it would also be helpful to the City to know the average age, expected useful life and current depreciated value of the aggregated distribution assets necessary to serve the City.

Further, since weather is such a large factor with regard to the utility's reliability, we would appreciate more specific information from the utility on weather related reliability impacts.

We are interested in understanding how Xcel is planning on adapting its infrastructure to meet significantly increased penetration of distributed generation within the city limits and, and its plans to implement "smarter" technology within the City limits to better manage distributed energy resources in the City and maintain reliability.

We realize that Xcel's feeders and substations do not exactly correlate to the City's geographic boundaries but we are confident that with further discussions and clarifications that this issue can be resolved to the better understanding of all parties, and the information we seek can be made available to us.

We recommend that in future Smart Grid reports, that Xcel be required to provide information on how they are using technology to make integrating distributed generation in the on the secondary network areas of their system easier and cheaper without compromising safety and reliability. Minneapolis recently installed a small solar installation in the downtown Minneapolis area at considerable additional cost under a pilot program and we believe that a more efficient process can and must be achieved.

We thank the state and Xcel Energy for all its good work on these issues in recent years, and encourage the state to continue its efforts to work with the utility to improve reporting and reliability.

Thank you for your consideration.



Paul Aasen,
City Coordinator

CERTIFICATE OF SERVICE

I, Gregory P. Sautter, hereby certify that I have this day, served a true and correct copy of the following documents to all persons at the addresses indicated below or on the attached list by electronic filings, electronic mail, courier, interoffice mail or by depositing the same enveloped with postage paid in the United States mail at Minneapolis, Minnesota.

City of Minneapolis Letter
Docket Number E, W002/M-13-255

Dated this 28th day of June, 2013.

/s/ Gregory P. Sautter

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Service List Member Information

Electronic Service Member(s)

Last Name	First Name	Email	Company Name	Delivery Method	View Trade Secret
Anderson	Christopher	canderson@allete.com	Minnesota Power	Electronic Service	No
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Kaufman	Mark J.	IBEW Local Union 949	12908 Nicollet Avenue South, Burnsville, MN-55337	Paper Service	No
Koehler	Thomas G.	Local Union #160, IBEW	2909 Anthony Ln, Minneapolis, MN-55418-3238	Paper Service	No
Marshall	Pam	Energy CENTS Coalition	823 7th St E, St. Paul, MN-55106	Paper Service	No
Plumbo	Joseph V.	Local Union 23, I.B.E.W.	932 Payne Avenue, St. Paul, MN-55130	Paper Service	No

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