

March 29, 2019

Daniel P. Wolf
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. E002/CI-18-251

Dear Mr. Wolf:

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

Xcel Energy's Integrated Distribution Plan

As discussed in the attached comments, the Department provides its response to the Minnesota Public Utilities Commission's (Commission) November 19, 2018 *Notice of Comment Period on Xcel Energy's Integrated Distribution Plan*

The Department is available to respond to any questions the Commission may have on this matter.

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. E002/CI-18-251

I. BACKGROUND

On August 30, 2018, the Minnesota Public Utilities Commission (Commission) issued an Order adopting Integrated Distribution Planning (IDP) filing requirements requiring Xcel Energy (Xcel, or the Company) to file an IDP for the next 10-year horizon by November 1, 2018.

Subsequently, Xcel filed its IDP entitled “Integrated Distribution Plan (2019-2028): Advancing the Grid at the Speed of Value” (IDP Report) on November 1, 2018.

The Commission issued a Notice of Comment Period on November 19, 2018 (Notice). The following topics are open for comment:

1. Should the Commission accept or reject Xcel Energy’s Integrated Distribution Plan (IDP)?
2. Does the IDP filed by Xcel Energy achieve the planning objectives outlined in the filing requirements approved in the Commission’s August 30, 2018 Order in this docket?
3. What, if any, adjustments should be made to future filing requirements?
4. Are there other issues or concerns related to this matter?

The initial round of comments were due on February 22, 2019. The Minnesota Department of Commerce, Division of Energy Resources (Department), as well as the following organizations and stakeholders, filed comments on or before February 22, 2019:

- (1) The Minnesota Office of Attorney General – Residential Utilities and Antitrust Division (OAG);
- (2) The City of Minneapolis;
- (3) Fresh Energy;
- (4) The Suburban Rate Authority (SRA);
- (5) Clean Energy Economy Minnesota (CEEM);
- (6) The Center for Energy and the Environment (CEE); and

- (7) Minnesota Center for Environmental Advocacy on behalf of Clean Grid Alliance, Minnesota Center for Environmental Advocacy, Sierra Club, and the Union of Concerned Scientists (MCEA).

The Department offers these reply comments in response to these initial comments. The Department focuses on stakeholders' recommendations for adding, deleting or modifying Xcel's IDP requirements.

II. DEPARTMENT ANALYSIS

A. INTRODUCTION

The Department appreciates the thorough review and thoughtful consideration from multiple stakeholders in this proceeding. Many of the recommendations and comments from stakeholders involve modifications or additions to the requirements for future IDP reports. The Department addresses the merits of these proposed changes in the broader context of distribution system planning in Minnesota and the concurrent IDP processes at other regulated utilities.

The Department believes this broader context is important in order to ensure an optimal outcome for ratepayers and the public interest. The Department provided our position on consistent IDP requirements among utilities in our initial comments in Docket Nos. E017/CI-18-253 (Otter Tail Power Company, or OTP), E015/CI-18-254 (Minnesota Power, or MP), and E011/CI-18-255 (Dakota Electric Association, or DEA). The Department reiterates our position here:

[T]he Department is supportive of draft IDP requirements for OTP that are as consistent with Xcel's IDP to the greatest extent practicable when appropriate, and is supportive of an evolutionary regulatory process that leads to consistent requirements between utilities to the greatest extent practicable.

The Department notes that it is important to adapt IDP requirements to the unique circumstances and characteristics of each utility such that a completely uniform set of requirements is likely precluded. Further, flexibility is an essential feature that should permeate throughout this regulatory effort. Utilities are likely to need time to adjust and grow into this regulatory paradigm as internal planning processes are exposed to regulatory oversight

and are harmonized with the Commission's IDP requirements. As the IDP process matures, the Department anticipates that a process that converges rather than diverges planning requirements for each of Minnesota's utilities is likely to lead to the most optimal outcome for ratepayers and the public interest.

Consistent regulatory requirements and standards in Minnesota utilities' IDPs are likely to lead to better results for all of Minnesota's ratepayers than a paradigm where IDPs vary to the extent that they result in inconsistent criteria used to assess the costs and benefits of distribution system planning, investments, and operations. Distribution system planning informs utility capital budget construction budgets, which currently includes typical distribution system improvements, equipment replacements, and service extensions.[footnote omitted] Utilities also rely on load forecasts down to the individual substation or feeder, and modeling designed to identify system reliability helps prioritize required capital projects.[footnote omitted] It's important to understand how utilities plan their distribution systems to assess how utilities avoid creating lock-in effects that could prevent a utility from considering other options, how utilities capture the full consideration of various alternatives, how utilities share information, and how utilities ensure that their planning results in efficient uses of ratepayer resources.

Uniformity and interoperability may help position utilities to leverage future technological advancements, to achieve economies of scale, enable distributed energy resource integration, improve system efficiency, and ultimately, reduce costs and increase benefits for Minnesota's ratepayers.

To illustrate the importance of consistent IDP requirements:¹ imagine a scenario in which the Commission has adopted a stringent cost-benefit analysis (CBA) test as part of Xcel's IDP requirements for investments in technologies that enable greater integration of distributed energy resources (DERs), but a less stringent CBA test for the same investments as part of a different utility's IDP requirements. Such a scenario will likely result in different investments

¹ The Department acknowledges that there will likely be irreconcilable differences in the evolution of each utility's IDP requirements due to inherent differences between each utility's distribution systems, capabilities, existing distribution system planning and operations processes, customers, and service territories, among myriad other factors.

being made that will affect the capability of each utility's respective distribution system to integrate DERs: a more stringent CBA test for Xcel may restrict wider integration of distributed energy resources (DERs) in Xcel's service territory, whereas a less stringent CBA test for another utility may enable greater integration of DERs in their service territory. Such an outcome could preclude utilities, developers, and ratepayers from reaping the benefits of achieving economies of scale and prevent the development of a consistent, seamless experience among utilities in the integration of DERs and in the accompanying ability to provide a wider array of energy services to ratepayers. Such disorderly distribution system development and arbitrary market segmentation in Minnesota is inefficient and suboptimal for ratepayers and the public interest.

Thus, the Department's analysis of other stakeholder recommendations related to Xcel's IDP requirements considers the larger picture of distribution system planning in Minnesota. The Department considers whether such modifications: (1) are reasonably likely to result in a benefit for ratepayers and the public interest; and (2) can be reasonably incorporated into other utilities' IDP requirements.

The Department notes that there may be a reasonable basis for adding, deleting, or modifying an IDP requirement for Xcel that may not exist for other utilities. However, it may be inherently difficult to make that determination at this present stage due to the information asymmetry that exists between the other regulated utilities and stakeholders. The capabilities of other utilities' distribution system planning and operations processes are likely not sufficiently well known enough to assess the reasonableness of adding, deleting, or otherwise modifying their IDP requirements at this stage. However, to the extent that utilities can be reasonably expected to perform similar tasks or have similar planning goals, a reasonable determination can be made at this time. In future IDP reports, the analysis of whether an IDP requirement can be applied to all utilities can be refined as more is learned about other utilities' distribution system planning and operations processes.

Last, the Department notes that determinations as to whether an IDP requirement should be added or modified for a non-Xcel utility should not be made in this proceeding, as the other utilities are not parties to this proceeding and a record is unavailable from which such determinations can be supported.

B. ANALYSIS OF PROPOSED MODIFICATIONS TO XCEL'S IDP REQUIREMENTS

1. OAG Proposals

While the OAG's proposals related to Xcel's IDP requirements do not include a specific location within Xcel's IDP requirements in which they should be included, the analysis need not rise to that level of detail until the Commission decides whether to adopt the recommendation. It

would be helpful for administrative purposes, moving forward, for all stakeholders to indicate the appropriate sections of the Xcel's IDP requirements that would be implicated in a recommendation to add, delete, or modify an IDP requirement. Additionally, it would likewise be useful if stakeholders framed each recommendation in language that could be incorporated into Xcel's IDP requirements and provide a red-line edition of Xcel's IDP requirements that reflect the stakeholder's recommendations.

a) Recommendations 1 and 2

i. Summary of Recommendations and Rationale

On page 9 of the OAG's initial comments, the OAG made the following recommendations that would add to Xcel's IDP requirements:²

The Commission should:

- Order Xcel to provide the results of its annual distribution investment risk-ranking, and a description of the risk ranking methodology, in future IDPs.
- Order Xcel to provide information on forecasted net demand, capacity, forecasted percent load, risk score, planned investment spending and investment summary information for all feeders and substation transformers, in future IDPs.

In support of the first recommendation, the OAG argued that the provision of this information is "a useful tool to better understand the risks to the distribution system, and how Xcel is responding to them."³

In support of the second recommendation, the OAG provided the following rationale:⁴

The risk-ranking information can be even more useful when it is combined with other information. Specifically, the OAG asked Xcel to provide the load factors of its feeders and substation transformers, which are used to identify distribution system risks. Combining that information with the risk-ranking analysis, and

² OAG Initial Comments, dated February 22, 2019, at 9.

³ *Id.*, at 7.

⁴ *Id.*, at 7-8.

identifying which feeders or substation transformers have work planned during the planning period, would produce a useful document for tracking Xcel’s distribution planning. The information could be combined in a single document similar to this example:

Figure 2
Example of Combined Distribution Feeder Information

Feeder	Forecasted Net Demand	Capacity	Forecasted Percent Load	Forecasted Load at Risk	Risk Score	SSS Investment	Description of Investment
A							
B							
C							

A single spreadsheet including this information would work towards several of the goals of the IDP program. It would allow the Commission and parties to understand how Xcel identifies and responds to risks on its system, track the utility’s performance over time, and better understand how its investment decisions are related to current capacity risks and growing distributed resource needs.[footnote omitted] Xcel was able to provide the OAG with much of this information in different information requests, so it does not appear that it would be labor-intensive to combine it together for future IDP filings.[footnote omitted]

Presenting this information in future IDPs would be consistent with the “walk” stage from the ICF International report presented to the Commission, which suggests gathering information about infrastructure replacement investment.[footnote omitted] Obtaining information in this way will help the Commission and parties understand how Xcel makes its investment decisions, and how those decisions relate to choices about advanced grid capabilities.[footnote omitted]

ii. Department Analysis

Xcel stated on pages 54 and 55 of the IDP Report that “one of the main deliverables of distribution planning’s annual analysis includes a detailed list of all feeders and substations for which a normal overload (N-0) is a concern.” Xcel also stated that they conduct an N-1 Contingency Analysis in which situations involving the loss of one feeder could cause other overloads on another are identified.⁵

⁵ Xcel Response to OAG IR No. 14, dated December 3, 2018.

Taken together, OAG recommendations 1 and 2 are aimed at requiring Xcel to provide more information related to how Xcel identifies and responds to risks in its distribution system. Consequently, it follows that investment decisions are impacted based on this risk analysis. These investment decisions are important to understand given the significant amount of capital expenditures that they can implicate. This risk analysis can also be useful in understanding the costs and benefits of other potential risk mitigation options, especially if a non-wires alternative (NWA) can be employed in mitigating the risk that Xcel identifies.

Given that Xcel performs this analysis on an annual basis, and that providing this information could aid in the understanding of both capital expenditures and consideration of NWAs as potential options for risk mitigation, the Department concludes that OAG recommendations 1 and 2 are reasonably likely to result in a benefit for ratepayers and the public interest.

As to whether OAG recommendations 1 and 2 could also be adopted by other utilities, the Department concludes that it is more than likely that other utilities employ some form of risk analysis in their distribution system planning, and further, that other utilities likely use this analysis as a basis in determining capital expenditures. While the precise form may not be able to take the same form as Xcel's risk analysis and the OAG's recommendations, the Department concludes that an appropriate, utility-by-utility specific form of the OAG's recommendations can be reasonably incorporated into other utilities' IDP requirements.

In conclusion, the Department supports OAG's first and second recommendations.

b) Recommendation 3

i. Summary of Recommendation and Rationale

On page 10 of the OAG's initial comments, the OAG made the following recommendation that would add to Xcel's IDP requirements:⁶

The Commission should:

- Order Xcel to file any long-range distribution studies it had conducted in the past year in future IDPs.

The OAG provided the following rationale in support of their recommendation:⁷

⁶ OAG Initial Comments, at 10.

⁷ *Id.*

It may be useful for the Commission and other parties to be kept aware of long-range studies, as they represent broader approaches to the challenges that Xcel faces along with potentially larger costs...It would also be helpful if Xcel could provide more information in its Reply Comments discussing how long-range area studies are related to the non-wires analysis it is required to conduct for future IDPs.

ii. Department Analysis

Xcel explained on pages 57 through 59 of the IDP Report that “distribution capacity planning address and solve a continuum of distribution equipment overload problems” and that Xcel’s planning engineers first consider localized alternatives to distribution system problems, increasing in scale to the point of a long-range area study if the engineers find that the alternatives do not mitigate the identified problems.

Xcel also stated that the long-range area studies involve the following:⁸

- Identifying the study area (for instance, a single feeder, a substation, or maybe even an entire community or larger).
- Projecting future loads.
- Estimating the saturation of area (limits of development, zoning, etc. on load growth). Coordinating with transmission planning to advise them of our work and learn if they have area concerns or projects.
- Generating options.
- Studying and comparing the economics and reliability of the alternatives.

It seems logical that as the scale of the distribution system problem increases, so do the potential mitigation options available to Xcel and their costs. Xcel explicitly considers economics of alternatives in their analysis of long-range area studies. Providing stakeholders with details of its long-range area studies can be useful in understanding how Xcel approaches larger scale issues in their distribution system and what options are available to mitigate them and at what cost. This additional information could also help stakeholders identify cost-effective solutions that Xcel may not have considered or point out areas where Xcel can improve its long-range area studies, both of which may benefit ratepayers and the public interest.

⁸ IDP Report, at 58.

Further, Xcel also stated the following:

DER has not historically been considered a viable alternative for resolving distribution capacity issues due to cost, reliability, capacity, longevity, dispatchability, space constraints and dependability. However, we see these constraints lessening as the technologies mature and operational experience increases.

If DERs have a potential to mitigate these issues, they should be considered explicitly in Xcel's planning processes, especially given Xcel's recognition that the constraints to using DERs as alternatives to resolving distribution system issues are lessening. If DERs can play a role in cost-effectively addressing larger scale distribution system issues, ratepayers would benefit from DERs being included in Xcel's alternatives analyses. Further, there is value for stakeholders in understanding the role that DERs can play in Xcel's long-range area studies.

It seems reasonable to expect that other utilities engage in long-range distribution studies regarding the scale of distribution system issues they each may face. While their planning processes are likely to be different, other utilities may still conduct analysis of wider areas of their distribution system in attempting to mitigate any issues. If they do conduct such analyses, the Department does not see the harm requiring other utilities to provide the analyses in their respective IDP reports. In general, it seems likely that other utilities can reasonably incorporate OAG recommendation 3 in their respective IDP requirements.

In conclusion, the Department supports the OAG's third recommendation.

c) Recommendation 4

i. Summary of Recommendation and Rationale

On page 17 of the OAG's initial comments, the OAG made the following recommendation that would modify one of Xcel's existing IDP requirements:⁹

The Commission should:

- Order Xcel to provide a cost-benefit analysis for each grid modernization project in its 5 year action plan, based on the

⁹ OAG Initial Comments, at 17.

best information it has at the time and including a discussion of non-quantifiable benefits and all supporting information.

The OAG's recommendation is a modification of IDP Requirement 3.D.2, which states in relevant part:

Xcel shall provide a 5-year Action Plan for distribution system developments and investments in grid modernization based on internal business plans and considering the insights gained from the DER futures analysis, hosting capacity analysis, and non-wires alternatives analysis. The 5-year Action Plan should include a detailed discussion of the underlying assumptions (including load growth assumptions) and the costs of distribution system investments planned for the next 5-years (expanding on topics and categories listed above). Xcel should include specifics of the 5-year Action Plan investments. Topics that should be discussed, as appropriate, include at a minimum:

...

- For each grid modernization project in its 5-year Action Plan, Xcel should provide a cost-benefit analysis.

Accordingly, it appears that the OAG's recommendation is to modify IDP Requirement 3.D.2 in the following way:

- For each grid modernization project in its 5-year Action Plan, Xcel should provide a cost-benefit analysis, based on the best information it has at the time and including a discussion of non-quantifiable benefits and all supporting information.

The OAG provided the following rationale in support of its recommendation:¹⁰

The two pages of explanation that Xcel provided for its cost-benefit analysis are not sufficient. Xcel did not share any supporting information for the cost estimates it provided for the grid modernization projects, or the cost-benefit ratios it reported. It did not provide explanations for any of the non-quantifiable benefits that it identified. Given the short turnaround for this first IDP filing, the OAG asked Xcel whether it intended to provide more or

¹⁰ OAG Initial Comments, at 12-13.

different information in future plans. In its response to OAG Information Request 63, Xcel stated that the IDP only requires it to discuss the issues listed in part D.2 to the extent that Xcel finds them to be appropriate, and that it did not provide more information because it was not yet seeking cost recovery for the AMI, FAN, or FLISR.[footnote omitted] That position is not consistent with the intent of the IDP, which requires that cost-benefit analyses be provided for every investment included in the 5-year Action Plan.[footnote omitted]

The OAG went on to provide details of several of Xcel's responses to various information requests that sought additional information related to Xcel's cost-benefit analyses of grid modernization projects included in its 5-year Action Plan. The OAG then provided the following:¹¹

All of the information that Xcel provided in response to the OAG's information requests was information that Xcel had at the time it filed the IDP. That information should have been included. Xcel correctly identifies that this proceeding does not raise cost recovery questions, and that cost-benefit analyses might change as it learns more about the projects. But Xcel should still provide the best information it has in order to comply with the IDP. The purpose of the IDP is to provide more transparency into Xcel's planning, and to ensure that Xcel is planning reasonably. It does not make sense for Xcel expend its ratepayer-funded resources developing projects that will not produce more benefits to ratepayers, even if non-quantifiable, than costs. Xcel should be prepared to demonstrate that it is considering costs and benefits throughout the entire life of a project, and not creating a new analysis only when it requests cost recovery. It is also somewhat concerning that Xcel appears to interpret the IDP requirements to allow it to ignore the cost-benefit analysis requirement when it wishes.

ii. Department Analysis

In review of Xcel's responses to the OAG's information requests related to Xcel's cost-benefit analyses of grid modernization projects included in Xcel's 5-year Action Plan, the Department

¹¹ *Id.*, at 17.

concludes that the public interest is better served in requiring Xcel to furnish additional information as recommended by the OAG. The additional level of detail provides for a more complete review of Xcel's methodology and imbues a greater sense of transparency in its planning processes. Transparency leads to a more accurate analysis of grid modernization projects, which results in greater certainty in assessing the merits of a project.

The language of OAG recommendation 4 is not prescriptive: it generally states that IDP Requirement 3.D.2 should be understood as requiring the utility to provide all of the information it has at the time it performs its cost-benefit analyses of grid modernization projects and to provide a discussion of non-quantifiable benefits. The Department agrees and sees no compelling reason why another utility could not reasonably incorporate OAG recommendation 4 in its IDP requirements.

In conclusion, the Department supports the OAG's fourth recommendation.

2. Fresh Energy Proposals

a) Recommendation 1

i. Summary of Recommendation and Rationale

On page 6 of Fresh Energy's initial comments, Fresh Energy made the following recommendation that would modify one of Xcel's existing IDP requirements:

We recommend that the Commission adjust the required IDP filing date such that the Company can incorporate its most current information in the IDP.

Fresh Energy's recommendation is a modification of the first section of Xcel's IDP requirements, though Fresh Energy did not recommend a modification of the specific date.

Fresh Energy noted that Xcel's "2018 IDP reflects results from its Q4 2017 annual planning process [footnote omitted] (not its Q4 2018 process)."

ii. Department Analysis

The Department is unaware of whether Xcel's next IDP will be based on its Q4 2019 annual planning process or its Q4 2018 process; however, the Department agrees with Fresh Energy that the IDPs should reflect the most recent and best available information. If Xcel's annual planning processes occur at times that preclude inclusion of that information in the annual IDP

report, it would be appropriate to change the filing date. The Department notes that the November 1 date was set to coincide with Xcel's Grid Modernization Report, which may provide regulatory efficiencies for Xcel.

The Department notes that the filing date for all utilities should be set at a point that would enable inclusion of the most recent planning information. If that were not the case, however, the modification proposed to Xcel's IDP requirements could be reasonably incorporated into their IDP requirements.

Once the Department and other stakeholders obtain additional information from Xcel regarding the timing of its annual planning processes and the most suitable filing date of the IDP report, a determination of the appropriateness of Fresh Energy's recommendation can be made.

b) Recommendations 2 and 3

i. Summary of Recommendation and Rationale

On page 6 of FE's initial comments, Fresh Energy made the following recommendations that would add two items to Xcel's existing IDP requirements:

- In addition to historic and forecasted expenditures, Fresh Energy recommends that the Company provide historic and forecasted work volumes or units of work (e.g., number of new services, miles of line extended, number of new street lights installed, etc.) for each expenditure category.
- For ease of analysis and comparison, Fresh Energy recommends that the Company provide this detailed level of historic/future expenditures and work volumes in a spreadsheet format with all links and formulas intact.

Fresh Energy did not provide an explicit rationale for these two recommendations.

Presumably, these two additional items would be appended to section 3.A, which details the requirements for Xcel's baseline distribution system and financial data.

ii. Department Analysis

Absent a rationale supporting the recommendations, it is unclear what the benefits would be from the provision of this additional information. However, if Xcel could easily provide such

information in future IDP reports, the Department does not oppose including these additional items. At this time, however, given the absence of a stated rationale, the Department declines to support these recommendations.

3. MCEA Proposals

a) Recommendation 1

i. Summary of Recommendation and Rationale

On page 2 of MCEA's initial comments, MCEA made the following recommendation modifying Xcel's IDP requirements:

While the \$2 million threshold for the NWA analysis was established as a part of the IDP filing requirements, we would strongly encourage the Commission to lower this amount for future IDPs.

MCEA's recommendation would modify section 3.E.1 of Xcel's IDP requirements, which states the following:

1. Xcel shall provide a detailed discussion of all distribution system projects in the filing year and the subsequent 5 years that are anticipated to have a total cost of greater than two million dollars. For any forthcoming project or project in the filing year, which cost two million dollars or more, provide an analysis on how non-wires alternatives compare in terms of viability, price, and long-term value

MCEA provided the following rationale in support of this recommendation:

Of these criteria, three are overly limiting and/or unclear: 1) eliminating projects that cost less than \$2 million...

Liberty Utilities in New Hampshire stated in its integrated resource plan[footnote omitted] that it would use a threshold of \$0.5 million as the cutoff for the projects to be considered for NWA. And National Grid (serving its Rhode Island service territory), uses \$1 million as its financial criteria for screening projects.[footnote omitted] The New York utilities use financial criteria of \$1 million

or several hundred thousand dollars depending on the location or complexity of the project.

ii. Department Analysis

The Department appreciates the provision of information related to the cost threshold for NWA analysis used by other jurisdictions. While this information is indeed useful, and, presumably lowering the threshold would result in a greater number of projects considered for NWA analysis, it isn't clear from the record that lowering the threshold will have a discernible benefit for ratepayers and the public interest. The Department notes that the threshold was at issue at the time the IDP requirements were developed and approved. The draft IDP set the cost threshold at \$5 million, which was lowered to \$2 million at the suggestion of CEE and general support of other stakeholders. Given the iterative nature of the IDP process, the Department concludes that a different cost threshold can be considered as experience is gained.

The Department also notes that the same \$2 million threshold exists for the other utilities, and therefore a different threshold can be considered if the threshold results in too few, or too many, projects discussed and NWA alternatives developed and analyzed.

Finally, the Department notes that the NWA analysis performed by Xcel was incomplete due to the timing of the Commission's August 30, 2018 Order that established Xcel's IDP requirements and the limited ability of Xcel to complete the NWA analysis of each of the projects identified in excess of the \$2 million threshold. The Department requested that Xcel provide additional information regarding the feasibility of providing a supplemental filing for NWA analysis before the 2019 IDP Report. If a supplemental filing for NWA analysis for the projects identified on page 85 of the IDP Report is provided, the Department requests that Xcel include a discussion of whether the \$2 million cost threshold is an appropriate level. This discussion should also provide information related to the number of projects that would be included in NWA analysis if the threshold were lowered to \$1 million and \$0.5 million tiers.

III. DEPARTMENT RECOMMENDATIONS

The Department recommends that the Commission approve the following changes to Xcel's IDP requirements:

- Require Xcel to provide the results of its annual distribution investment risk-ranking, and a description of the risk ranking methodology, in future IDPs.

- Require Xcel to provide information on forecasted net demand, capacity, forecasted percent load, risk score, planned investment spending and investment summary information for all feeders and substation transformers, in future IDPs.
- Require Xcel to file any long-range distribution studies it had conducted in the past year in future IDPs.
- Amend IDP Requirement 3.D.2 as follows:

For each grid modernization project in its 5-year Action Plan, Xcel should provide a cost-benefit analysis, based on the best information it has at the time and including a discussion of non-quantifiable benefits and all supporting information.

The Department also requests that, in the future, stakeholders indicate the appropriate sections of the Xcel's IDP requirements that would be implicated in a recommendation to add, delete, or modify an IDP requirement. Additionally, it would likewise be useful if stakeholders framed each recommendation in language that could be incorporated into Xcel's IDP requirements and provide a red-line edition of Xcel's IDP requirements that reflect the stakeholder's recommendations.

The Department requests the Xcel indicate whether selection of a different filing date would better enable the Company to include the most recent planning information in its Integrated Distribution Plan.

Finally, the Department requests that Xcel provide additional information regarding the feasibility of providing a supplemental filing for NWA analysis before the 2019 IDP Report. If a supplemental filing for NWA analysis for the projects identified on page 85 of the IDP Report is provided, the Department requests that Xcel include a discussion of whether the \$2 million cost threshold is an appropriate level. This discussion should also provide information related to the number of projects that would be included in NWA analysis if the threshold were lowered to \$1 million and \$0.5 million tiers.

/ja

CERTIFICATE OF SERVICE

I, Linda Chavez, hereby certify that I have this day served copies of the following document on the attached list of persons by electronic filing, 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 Nos. **E002/CI-18-251**

Dated this **29th** day of **March, 2019**.

/s/Linda Chavez

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Tony	Brunello	BADEMAIL-tbrunello@greentechleadership.org	Greentech Leadership Group	426 17th St Ste 700 Oakland, CA 94612-2850	Paper Service	No	OFF_SL_18-251_Official
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Jessica	Burdette	jessica.burdette@state.mn.us	Department of Commerce	85 7th Place East Suite 500 St. Paul, MN 55101	Electronic Service	No	OFF_SL_18-251_Official
Jason	Burwen	j.burwen@energystorage.org	Energy Storage Association	1155 15th St NW, Ste 500 Washington, DC 20005	Electronic Service	No	OFF_SL_18-251_Official
Douglas M.	Carnival	dmc@mcgrannshea.com	McGrann Shea Carnival Straughn & Lamb	N/A	Electronic Service	No	OFF_SL_18-251_Official
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	OFF_SL_18-251_Official
Kenneth A.	Colburn	kcolburn@symbioticstrategies.com	Symbiotic Strategies, LLC	26 Winton Road Meredith, NH 32535413	Electronic Service	No	OFF_SL_18-251_Official
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1800 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_18-251_Official
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174 Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_18-251_Official
Arthur	Crowell	Crowell.arthur@yahoo.com	A Work of Art Solar	14333 Orchard Rd. Minnetonka, MN 55345	Electronic Service	No	OFF_SL_18-251_Official
David	Dahlberg	davedahlberg@nweco.com	Northwestern Wisconsin Electric Company	P.O. Box 9 104 South Pine Street Grantsburg, WI 548400009	Electronic Service	No	OFF_SL_18-251_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Curt	Dieren	curt.dieren@dgr.com	L&O Power Cooperative	1302 S Union St Rock Rapids, IA 51246	Electronic Service	No	OFF_SL_18-251_Official
Ian	Dobson	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_18-251_Official
Brian	Draxten	bhdraxten@otpc.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380498	Electronic Service	No	OFF_SL_18-251_Official
Kristen	Eide Tollefson	healingsystems69@gmail.com	R-CURE	28477 N Lake Ave Frontenac, MN 55026-1044	Electronic Service	No	OFF_SL_18-251_Official
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James C.	Erickson	jericksonkbc@gmail.com	Kelly Bay Consulting	17 Quechee St Superior, WI 54880-4421	Electronic Service	No	OFF_SL_18-251_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Brad	Klein	bklein@elpc.org	Environmental Law & Policy Center	35 E. Wacker Drive, Suite 1600 Suite 1600 Chicago, IL 60601	Electronic Service	No	OFF_SL_18-251_Official
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Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_18-251_Official
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Annie	Levenson Falk	annief@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota Street, Suite W1360 St. Paul, MN 55101	Electronic Service	No	OFF_SL_18-251_Official
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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David	O'Brien	david.obrien@navigant.com	Navigant Consulting	77 South Bedford St Ste 400 Burlington, MA 01803	Electronic Service	No	OFF_SL_18-251_Official
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Russell	Olson	rolson@hcpd.com	Heartland Consumers Power District	PO Box 248 Madison, SD 570420248	Electronic Service	No	OFF_SL_18-251_Official
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Dean	Sedgwick	N/A	Itasca Power Company	PO Box 455 Spring Lake, MN 56680	Paper Service	No	OFF_SL_18-251_Official

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Christopher	Zibart	czibart@atcllc.com	American Transmission Company LLC	W234 N2000 Ridgeview Pkwy Court Waukesha, WI 53188-1022	Electronic Service	No	OFF_SL_18-251_Official