COOPERATIVE ENERGY FUTURES
COMMUNITY POWERED ENERGY

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

June 5, 2020

RE: Comments of Cooperative Energy Futures (Late Filed)
In the Matter of Xcel Energy Hosting Capacity Analysis Report PUC Docket No. E002/M-19-685

Dear Mr. Seuffert and Commissioners,

Cooperative Energy Futures (CEF), a Minnesota Cooperative Association, submits this letter to express its support for Decision Options 3, 8a-f, 13, and 17, and provide some information from our perspective as a user of the Hosting Capacity Analysis (HCA) Map and MNDIP Pre-Application Screens.

CEF recently became aware that the Commission is considering improvements to the HCA in this docket and that no other solar developers commented on these improvements. We file these late comments because as a community-based developer of community solar projects and as a member-based local clean energy development organization exploring future opportunities to empower local and equitable DER development across Minnesota, the future of the HCA is deeply relevant to us. CEF attempts to utilize the existing HCA Map published by Xcel on a regular basis, and also utilized Pre-Application screens for several of the proposed project locations of interest to our members.

We generally support the comments of Interstate Renewable Energy Council (IREC), Fresh Energy, the Department of Commerce, and the City of Minneapolis around requesting more detailed public information to be provided in the HCA and more regular updating of the map in order for it to become a useful tool to plan DER integration. In particular, we support the requests to:

1. **Ensure Regular - Preferably Monthly - Updating of the Hosting Capacity Analysis and Map**

When initially introduced to CEF and other community solar developers, the HCA Map was described as a tool that was updated periodically based on new projects added and changes that have been made. Over time, and most recently through the workshop held last Tuesday, it has become clear that the periodic updates based on changes are in fact performed only annually, with data released several months after changes occur. Over the course of the rest of the year, the results reported will be from 3 to 15 months out of date. This practice explains much of the discrepancy we have observed between the available capacity reported by the map, and the actual results from Engineering Studies of specific sites which so far has made the publicly provided HCA Map of limited value for identifying viable locations for cooperative community solar.

CEF supports Decision option 8 (and all sub-options a-f) to direct Xcel to update the HCA and map on a monthly basis. As indicated by IREC, Xcel's provided cost projections for more frequent updates are not

defensible, as they primarily list portions of cost already incurred in the current annual analysis. By updating feeder models each month for which significant changes in load or generation have occurred, it is reasonable to believe that the incremental cost of updating the HCA on this frequency would be minimal. On the other hand, this frequency of updates will help make the HCA a useful tool for our cooperative's members and other DER customers across Xcel Energy's territory.

2. Include More Granular Feeder and Substation Level Data in Tabular and Mapped Results

Xcel's modelling approach, as explained in last week's workshop, necessarily includes calculation and GIS mapping of a variety of types of data that would be very valuable to potential DER customers, including feeder and transformer minimum loads, peak loads, limiting factors, criteria violation values, and others. Some of these values are provided at the feeder level in the tabular spreadsheet, but nearly all of these data are absent from the HCA map, which even abstracts the hosting capacity into broad color blocks rather than showing actual feeder locations. Xcel has argued that this data should not be mapped, but it cannot identify a reason not to publish the data identified in Decision Option 3 . Other data is provided at the feeder level in other reports, there at minimum should be very little additional work required to display it on the map. Furthermore, since Xcel Energy's HCA method conducts much of this analysis on the sub-feeder level, there should be no logistical barrier to providing and mapping the criteria violation values on the sub-feeder segments that Xcel models in its analysis.

CEF supports Decision Options 3, 13, and 17, along with the aforementioned 8a-f, which would together provide much of the data already available through the HCA in a much more useful and relevant format. Doing so would eliminate obstructions to DER customer data access that serve no purpose other than to obscure DER potential on these feeders.

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In conclusion, we appreciate the opportunity to share our experience on behalf of our members across Minnesota and support for the recommendations already advanced by other parties. We look forward to the evolution of the HCA into a useful and usable tool for Minnesota communities to envision and plan DERs that will meet their communities' needs.

Sincerely,

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