

**STATE OF MINNESOTA
BEFORE THE PUBLIC UTILITIES COMMISSION**

Nancy Lange	Chair
Dan Lipschultz	Vice Chair
Matt Schuerger	Commissioner
Katie Sieben	Commissioner
John Tuma	Commissioner

In The Matter Of Distribution System
Planning For Otter Tail Power Company

DOCKET NO. E-017/CI-18-253

In The Matter Of Distribution System
Planning For Minnesota Power

DOCKET NO. E-015/CI-18-254

In The Matter Of Distribution System
Planning For Dakota Electric

DOCKET NO. E-111/CI-18-255

**COMMENTS OF THE OFFICE
OF THE ATTORNEY GENERAL**

The Office of the Attorney General – Residential Utilities and Antitrust Division (“OAG”) respectfully submits these Comments in response to the Notice of Comment Period (“Notice”) on Draft Integrated Distribution (“IDP”) Requirements (“Draft”) issued by the Commission on June 12, 2018 in Dockets 18-253, 18-254, and 18-255.

As with the other IDP proceedings currently underway, the OAG appreciates the extensive work that Staff undertook to produce the Drafts for Minnesota Power, Otter Tail Power Company, and Dakota Electric Association. Developing an IDP may provide significant benefits to ratepayers and position these utilities to lower costs, improve renewable integration, and improve the performance of their systems. The OAG supports the establishment of an IDP process for Minnesota Power, Otter Tail Power Company, and Dakota Electric Association as laid out by the Drafts in these proceedings. The OAG also supports incorporating all of the

additions and modifications that were made to the draft report in Docket 18-251.¹ At this time, there does not appear to be any clear reason to approve different requirements than those that were approved for Xcel.

In particular, two OAG recommendations that were adopted in Docket 18-251 should also be included in IDPs for other utilities. First, a new objective should be added to the Draft IDPs: “Provide the Commission with the information necessary to understand [the utility’s] short-term and long-term distribution system plans, the costs and benefits of specific investments, and a comprehensive analysis of ratepayer cost and value.” Second, the Draft IDP should include the following requirement: “For each grid modernization project in its 5-year Action Plan, the utility should provide a cost-benefit analysis.”

¹ *In the Matter of Distribution System Planning for Xcel Energy*, Docket No. E-002/CI-18-251, ORDER APPROVING INTEGRATED DISTRIBUTION PLANNING FILING REQUIREMENTS FOR XCEL ENERGY (Aug. 30, 2018).

The OAG looks forward to reviewing proposals by other parties, including the utilities, and providing further comments if necessary.

Dated: September 7, 2018

Respectfully submitted,

LORI SWANSON
Attorney General
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s/ **Ryan P. Barlow**

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September 7, 2018

Mr. Daniel Wolf, Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place East, Suite 350
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Re: *In The Matter Of Distribution System Planning For Otter Tail Power Company*
MPUC Docket No. E-017/CI-18-253
In The Matter Of Distribution System Planning For Minnesota Power
MPUC Docket No. E-015/CI-18-254
In The Matter Of Distribution System Planning For Dakota Electric
MPUC Docket No. E-111/CI-18-255

Dear Mr. Wolf:

Enclosed and e-filed in the above-referenced matters please find Comments of the Minnesota Office of the Attorney General – Residential Utilities and Antitrust Division.

By copy of this letter all parties have been served. An Affidavit of Service is also enclosed.

Sincerely,

s/ **Ryan P. Barlow**

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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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