

March 29, 2019

Daniel P. Wolf, Executive Secretary  
Minnesota Public Utilities Commission  
121 7th Place East, Suite 350  
St. Paul, MN 55101

**RE: CENTER FOR ENERGY AND ENVIRONMENT’S REPLY COMMENTS IN THE MATTER OF THE XCEL ENERGY’S INTEGRATED DISTRIBUTION PLAN FOR 2019–2028  
DOCKET No. E002/CI-18-251**

Dear Mr. Wolf:

Center for Energy and Environment (“CEE”) respectfully submits the following Reply Comments to the Minnesota Public Utilities Commission (“Commission”) in response to Comments filed by parties’ on February 22, 2019, in the Matter of Xcel Energy’s Integrated Distribution Plan for 2019–2028 in the above referenced docket.

We thank parties for their thoughtful engagement with this topic and appreciate the opportunity to respond. The parties provided a wealth of input for consideration — some detailed and specific, and some more broad. For these Reply Comments, CEE will provide information about our geotargeting pilot project, as requested by Fresh Energy in its Comments. We will also respond broadly to certain themes that arose from the overall body of Comments and provide our suggestions for moving forward.

Lessons from CEE’s Geotargeting Pilot Project

On page four of Fresh Energy’s Comments in this docket, Fresh Energy asks that Xcel Energy provide a description of what the company has learned from the Geotargeted Distributed Clean Energy Initiative pilot project (“geotargeting pilot”) and how the lessons learned help improve its process for evaluation and deployment of non-wires alternatives. CEE is currently finalizing the implementation plan for the geotargeting pilot and intends to launch in the summer of 2019, with a final report completed in June 2020. Below are the learning objectives of the pilot:

- What types of distribution system needs offer the best opportunity for distributed energy resources?
- To what extent can location-specific targeting with additional customer incentives lead to increased distributed energy resources?
- What customer end-use characteristics make for the best opportunities? Can the distributed energy resources screening process be automated?
- What is the statewide potential for distributed energy resources geotargeting to defer distribution upgrades?

- What type of program and policy changes are needed to support geotargeting in Minnesota?

Our work to prepare for the pilot has offered some insight into which types of locations may be best suited for a geotargeting project. To date, some criteria we have noted include: 1) projects that address capacity needs (versus reliability or asset health); 2) projects that are at least three years in the future, to allow enough time to procure non-wires resources; and 3) projects where the customer base is large and diverse enough to mitigate against the uncertainty of individual customer decisions.

#### Themes of Comments and Moving Forward

CEE echoes the recommendation of many other parties to this docket that the Commission accept Xcel Energy's Integrated Distribution Plan for 2019–2028. Xcel Energy's Integrated Distribution Plan ("IDP") filing for 2019–2028 is an extensive document, reflecting an immense amount of work by the company. As noted in our Comments to this docket, we view this plan as foundational to the purpose of educating regulators and stakeholders on the utility's distribution system and its planning process. We hope to see Xcel Energy's future IDP filings evolve and be refined to focus more narrowly and more deeply on the distribution planning components that provide the most value to regulators and stakeholders. This refinement will take a concerted effort by parties and regulators to identify areas of the report that may be streamlined or reported on a less frequent timeframe, so that the company can focus its resources to report on aspects of distribution planning that are most pertinent for regulators and stakeholders. For these reasons, we recommend that the Commission accept Xcel Energy's IDP filing for the 2019–2028 timeframe and that parties and regulators turn our focus to how Xcel Energy's next IDP filing can be refined and improved in order to provide the most value to stakeholders and regulators.

CEE believes that there may be topics, and potentially full sections of the IDP report, that could be dramatically streamlined or reported on a less frequent timeframe — perhaps every three or five years. These include background sections such as the System Overview section, System Planning section, and Asset Health and Reliability Management section. Conversely, there were sections of the report — specifically the Grid Modernization section, the Non-Wires Alternatives Analysis section, and the Distributed Energy Resources section — about which many stakeholders wanted additional analysis or description. We believe it is worth asking regulators and stakeholders if each section of the report is complete, valuable, and useful, as well as whether the information provided could be reported on a timeframe that is less frequent than annually.

CEE believes that Xcel Energy's stakeholder process around its IDP may be the most effective venue for refining the IDP report moving forward. However, we note that the Commission will need to provide explicit direction and guidance if information and detail should be removed from future plans, versus added.

Conclusion

CEE appreciates the opportunity to provide additional input on this docket and thanks the Commission for its consideration of our remarks.

Sincerely,

/s/

Jennifer Edwards  
Director, CEE Innovation Exchange

BEFORE THE MINNESOTA DEPARTMENT OF COMMERCE  
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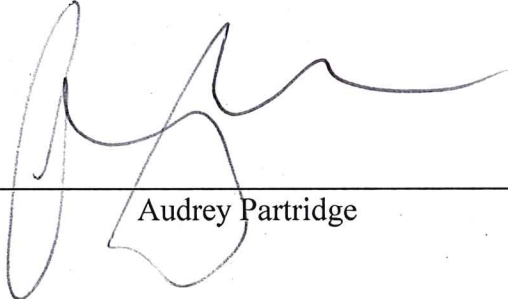
**AFFIDAVIT OF SERVICE**

**DOCKET NO. E002/CI-18-251**

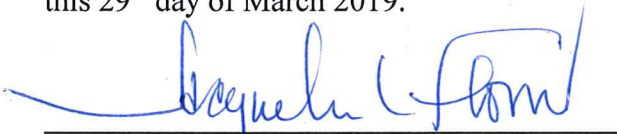
I, Audrey Partridge, hereby certify that on this 29<sup>th</sup> day of March 2019, I served Center for Energy and Environment's *Reply Comments in the Matter of Xcel Energy's Integrated Distribution Plan for 2019-2028* in Docket No. E002/CI-18-251 on the following persons on the attached Service Lists by:

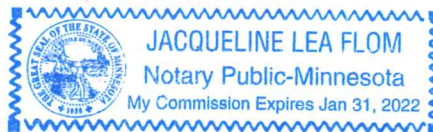
XX placing such filing in envelopes, properly addressed, and depositing the same in the Post Office at the City of Minneapolis, for delivery by the United States Post Office as directed by said envelopes.

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\_\_\_\_\_  
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Subscribed and sworn to before me  
this 29<sup>th</sup> day of March 2019.

  
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