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September 7, 2018

VIA ELECTRONIC FILING

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2147

Re: In the Matter of Distribution System Planning
Docket No. E015/CI-18-254

Dear Mr. Wolf:

Minnesota Power hereby submits, via electronic filing, its Initial Comments in response to the Minnesota Public Utilities Commission's June 12, 2018 Notice of Comment Period on Draft Integrated Distribution Planning Requirements for Minnesota Power ("Notice") in docket no. E015/CI-18-254. Minnesota Power submits its response to the Notice through these initial comments.

Please contact me at the number or email above with any questions or concerns.

Respectfully,

Jenna Warmuth

JW:sr
Attach.

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

In the Matter of Distribution System
Planning for Minnesota Power

Docket No. E015/CI-18-254
INITIAL COMMENTS

I. Introduction

The Minnesota Public Utilities Commission (or, “Commission”) released a Notice of Comment Period on Draft Integrated Distribution Planning Requirements (“Draft Requirements”) for Minnesota Power (“Notice”) on June 12, 2018. In the Notice the Commission outlined topics open for comment. The topics open for comment are as outlined below:

1. Should the attached draft IDP requirements be modified? If so, provide specific edits with rationale and indicate the intent of the proposed change.
2. Are there specific scenarios, inputs, or assumptions that Minnesota Power should consider in its initial filing? What are reasonable medium and high scenarios (C2)?
3. Please address the following areas (in reference to the attached draft IDP requirements):
 - a. Are the annual or biennial filing requirements reasonable?
 - b. Are there additional parameters or requirements that should be part of 2. Stakeholder Meetings?
 - c. Should the categories under Financial Data (A19) be modified? Are there consistent categories across utilities that could be utilized?
 - d. Should the Long-Term Distribution System Plan components (Section D) be on a 10-year (shorter term) outlook or a 15-year outlook (to correspond with Integrated Resource Plan timing)?
4. Are there other issues or concerns related to this matter?

The Draft Requirements are a product of discussions between Minnesota Power (or, “the Company”) and Commission Staff. These discussions were valuable and the Company thanks Staff for their insight and responsiveness to the Company’s concerns and clarifications. The resulting Draft Requirements require few clarifications, as are outlined through these comments.

II. RESPONSE TO TOPICS OPEN FOR COMMENT

1. *Should the attached draft IDP requirements be modified? If so, provide specific edits with rationale and indicate the intent of the proposed change.*

Minnesota Power suggests slight modifications, and outlines clarifications that need to be made, to the Draft Requirements. Rationale for these edits and clarifications is provided in the sections below.

Section A –

A (8): Distribution system annual loss percentage for the prior year (average of 12 monthly loss percentages).

The Company would like clarification on the annual loss percentage calculation. Is the percentage intended to be based on a per-circuit basis or a per-voltage basis? The Company believes a per-voltage class makes more sense because the big driver in loss percentage is voltage.

A (9): The maximum hourly coincident load (kW) for the distribution system as measured at the interface between the transmission and distribution system. This may be calculated using SCADA data or interval metered data or other non-billing metering / monitoring systems.

The Company would like clarification on the intent of this requirement. Is this meant to capture system-wide coincident peak or individual peaks by substation? The Company's preference is to provide peaks by substation.

A (10) & A (11): Total distribution substation capacity in kVA; Total distribution transformer capacity in kVA.

The Company would like Staff to clarify the purpose of these requirements so that it can provide the best possible response in the context for which it is intended.

Section B -

B (1): Provide an excel spreadsheet (or other equivalent format) by feeder of either daytime minimum load (daily, if available) or, if daytime minimum load is not available, peak load (time granularity should be specified)

The Company prefers to provide a single, annual daytime minimum load. Daytime minimum loads are the driver for system design. Deriving daily minimum loads would be a time-consuming, and resource intensive, process.

Section C -

C (1): In order to understand the potential impacts of faster-than-anticipated DER adoption, define and develop conceptual base-case, medium, and high scenarios regarding increased DER deployment on the distribution system. Scenarios should reflect a reasonable mix of individual DER adoption and aggregated or bundled DER service types, dispersed geographically across

the Minnesota Power distribution system in the locations Minnesota Power would reasonably anticipate seeing DER growth take place first.

The Company requests clarification on the specific types of DER to be considered for purposes of the Draft Requirements. There are various ways to define DERs and it would be helpful to have direction on which types of DER the Commission anticipates will be included in the Company's Draft Requirements.

C (4): Include information on anticipated impacts from FERC Order 8414 (Electric Storage Participation in Markets Operated by Regional Transmission Organizations and Independent System Operators) and a discussion of potential impacts from the related FERC Docket RM18-9-000 (Participation of Distributed Energy Resource Aggregations in Markets Operated by Regional Transmission Organizations and Independent System Operators).

The Company believes this requirement should be removed as it is not applicable to an annual or biennial distribution report. MISO is in the process of determining its compliance plan for FERC Order 841. Once MISO implements its process, the resulting impacts will be naturalized into the system and will become part of the value that the Company attributes to DER resources in its planning process. Attempting to separately analyze the impacts would require indefinitely tracking of scenarios "with FERC Order 841" and "without FERC Order 841," where the "without" scenario is purely theoretical (i.e., requiring a determination of the theoretical value of a DER resource, leaving aside its MISO value).

2. Specific scenarios, inputs, or assumptions? Reasonable medium and high scenarios (C2)?

Minnesota Power views the proposed low, medium and high DER scenario requirements as reasonable. However, the DER adoption rates assumed in each scenario should not apply indiscriminately to all utilities in the state and should be specific to each individual utility's system and customer mix.

3. Please address the following areas (in reference to the attached draft IDP requirements):

a. Are the annual or biennial filing requirements reasonable?

Minnesota Power is positioned to provide an initial report by the proposed initial filing date of November 1, 2019. On an ongoing basis, Minnesota Power expects the process of performing the required studies, drafting the report, and completing the stakeholder outreach, will consume the full two-year timeline.

b. Are there additional parameters or requirements that should be part of 2. Stakeholder Meetings?

Minnesota Power has no further suggestions or changes to the stakeholder meeting requirement.

- c. *Should the categories under Financial Data (A19) be modified? Are there consistent categories across utilities that could be utilized?*

Minnesota Power supports the categories included in the draft requirements.

- d. *Should the Long-Term Distribution System Plan components (Section D) be on a 10-year (shorter term) outlook or a 15-year outlook (to correspond with Integrated Resource Plan timing)?*

Minnesota Power considers a 5-year plan combined with the current proposed biennial filing requirement as sufficient in regards to long-term outlooks on the distribution grid. However, if required, the general long-term discussion should focus on broad issues and concepts rather than specific projects and assumptions. Given the nature of the distribution system and the fast pace of change, a 10-year outlook would be more appropriate than a 15-year outlook. If a 10-year outlook is included in the final requirements, it should be presented as a roadmap and strategic outlook of the Company and include such information as: anticipated DER adoption rates, policy considerations, etc.

III. Conclusion

Minnesota Power appreciates the opportunity to provide feedback on the Draft Requirements in a timely and collaborative manner. As the distribution grid continues to evolve and move into the next phase of heightened DER adoption, the Company is poised to manage the transition successfully. It is the Company's objective to provide educational and valuable information to all of its stakeholders through these biennial filings.

Dated: September 7, 2018

Respectfully submitted,



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AFFIDAVIT OF SERVICE VIA
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SUSAN ROMANS of the City of Duluth, County of St. Louis, State of Minnesota,
says that on the 7th day of **September, 2018**, she served Minnesota Power's Comments in
Docket No. E015/CI-18-254 on the Minnesota Public Utilities Commission and the Office
of Energy Security via electronic filing. The persons on E-Docket's Official Service List
for this Docket were served as requested.



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