

Revised Decision Options

Minnesota Power Integrated Distribution Plan and Transportation Electrification Plan
Docket E002/M-23-258

- Minnesota Power, the Department, and CEG sent preferred decision options. Where there are changes in support from the briefing papers Staff has noted it in (red underline)
- New decision options are also included in red underline and prefaced by the organization sponsoring them, for example “CEG 16”
- CEG 16 is a combination of DO 16 and DO 19. Based on Minnesota Power and the Department’s positions, Staff believes CEG 16 should be acceptable to all participants. Staff has no objection to CEG 16.
- Staff has listed where participants are opposed to a decision option. If a non-utility participant is not listed under support or oppose, they took no position on the issue. In some instances, Staff has provided additional context when a participant took no position.
- Submissions received by participants are attached to the end of the revised decision options and contain additional context on participant preferences.

Summary of Positions

DO	Minnesota Power	Department	CEG
1	Support	No Position	No Position
2	No Position	Support	No Position
2a	Oppose	Support	No Position
3	Oppose	Support	No Position
4	No Position	Support	No Position
5	Support along with 5b/5c, no position on 5a, 5d-f	Support	No Position
6	Oppose	Support	No Position
7	Support	Oppose	No Position
8	Support	Oppose	No Position
9	Oppose	Support	No Position
10	No Position	Support	No Position
11	Support	Support	No Position
12	Support	Support	No Position
13	Support	Support	Support
14	Support	Support	Support
15	Oppose	Support	Support
16	Support	Support	Support
CEG 16	No Position	No Position	Support
17	Support	Support	Support
18	Support	Support	Support
19	Support	Oppose if 16 adopted	See CEG 16

Decision Options

IDP Acceptance

The Commission should select DO 1 or DO 2

1. Accept Minnesota Power's 2023 IDP Report as in compliance with IDP reporting requirements. Acceptance of the 2023 IDP has no bearing on prudence nor certification under Minn. Stat. § 216B.2425, subd. 3. (Minnesota Power)

OR

2. Accept Minnesota Power's 2023 IDP report as in compliance with IDP reporting requirements contingent on the Company making additional filings as noted below. Acceptance of the 2023 IDP has no bearing on prudence nor certification under Minn. Stat. § 216B.2425, subd. 3. (Department)
 - a. Require Minnesota Power to file separate cost-benefit analyses for FLISR, the Smart Sensor Program, OMS, and GIS, through supplemental filings within 180 days of the Order. (Department)

Opposed: Minnesota Power

Staff notes the Department determined Minnesota Power's NWA was not compliant with the filing objects, Staff listed all NWA related DOs together for clarity.

Modification for Future IDPs

*The Commission may select DO 3 **AND/OR** 4, **OR** DO 5, or none of the options. These decision options are explained the Joint Briefing Papers.*

3. Require Minnesota Power in its next IDP to develop a suite of metrics to track resiliency, including SAIDI with MEDs and SAIFI with MEDs, and other metrics to the extent warranted. (Department)

Opposed: Minnesota Power

AND/OR

4. Require Minnesota Power to provide a proposal for measuring the capacity, reliability, ratepayer, and equity impacts of its distribution grid investments in its next IDP. This proposal shall specifically address the level of granularity at which Minnesota Power will evaluate these impacts for each budget category, including for each category whether Minnesota Power plans to measure these impacts at the level of the budget category, program, project, or at some other level of resolution, or not at all, and specifically accounting for the impact of any expected changes to IDP budget categories.

(Department – now supports DO 5)

Opposed: Minnesota Power

OR

5. Delegate authority to the Executive Secretary to work with Minnesota Power and stakeholders to discuss metrics reported across distribution dockets, and delegate authority to the Executive Secretary to approve via notice a stakeholder agreement on

metrics reporting if one is reached. At minimum, the proposal and metrics should include the following components:

- a. Reliability metrics such as SAIDI, SAIFI, CAIDI, CEMI, and CELI
- b. Distribution spending by IDP budget categories
- c. Whether there is available hosting capacity for generation or load at the primary system level
- d. Demographic data including race and income
- e. Installed DERs, ECO rebates, DR customers enrolled in programs, etc.
- f. Metrics reported at a feeder and/or census block group level

(Staff, Minnesota Power – with no position on 5a, d, e, and f, Department)

*The Commission may select either DO 6 **OR** DO 7, or neither. These decision options are explained the Joint Briefing Papers.*

6. Require Minnesota Power to make a supplemental filing within [180 days] of the Order in this docket that proposes a plan to accelerate beneficial electrification for its customers, including a discussion of how to incentivize dual fuel adoption for space heating and electrification of water heating, and provide forecasts of expected grid impacts of the same. (Department)

Opposed: Minnesota Power

OR

7. Delegate Authority to the Executive Secretary to work with Minnesota Power, the Department, and stakeholders to modify the IDP filing requirements to include discussions of the impacts of electrification where appropriate. Delegate authority to the Executive Secretary to approve via notice a stakeholder agreement on amended filing requirements if one is reached. (Staff, Minnesota Power)

Opposed: Department

Non-Wires Alternatives

*The Commission must select either DO 8 **OR** DO 9*

8. Accept Minnesota Power's current NWA analysis and find it is compliant with the Filing Requirement 3.E.2.d and 3.E.2.b. (Minnesota Power, Staff)

Opposed: Department

9. Find that Minnesota Power's current NWA analysis is not compliant with the Filing Requirement 3.E.2.d and 3.E.2.b. (Department)

Opposed: Minnesota Power

OR

10. Require Minnesota Power in its next IDP to file a comprehensive NWA evaluation process. (Department)

Minnesota Power took no position

The Commission may select DO 11 or 12, or neither option

11. Require Minnesota Power in its next IDP to consider demand response, energy efficiency, and renewable generation as part of its future NWA process. (Department, [Minnesota Power](#))
12. Require Minnesota Power to provide cost-benefit analysis for the Cloquet Area project through a supplemental filing within 180 days of the Commission's Order. (Department, [Minnesota Power](#))

Transportation Electrification Plan

*The Commission should select DO 13 **and** 14.*

13. Approve Minnesota Power's 2023 Transportation Electrification Plan. (Minnesota Power, Department, Clean Energy Groups)
14. Require Minnesota Power to file its next TEP by November 1, 2025. (Staff, [Minnesota Power](#), [Department](#))

The Commission may select any combination of DO 15-19, or none of the options

15. Require Minnesota Power to file a residential EV managed charging program that does not require second service or participation in a whole-home time of use rate on or before the date of their next Transportation Electrification Plan. (CEGs)
Opposed: Minnesota Power

16. Require Minnesota Power to include a discussion of how the Company is preparing and supporting adoption of medium- and heavy-duty electric vehicles, specifically transit buses, school buses, and trucks in their future TEPs. (CEGs, [Minnesota Power](#), [Department](#))

CEG 16 Require Minnesota Power to include a discussion of how the Company is preparing and supporting adoption of medium- and heavy-duty electric vehicles, specifically transit buses, school buses, and trucks in their future TEPs, [and a count of each named category domiciling in the Company's service territory \(e.g. number of transit buses, number of school buses, and number of trucks\)](#) (CEGs, combination of DO 16 and 19)

17. Require Minnesota Power to include a discussion of equity and an analysis of how the Company's EV programs are serving communities disproportionately impacted by transportation pollution including renters, multifamily housing residents, communities of color, "low-to-moderate income" customers, and rural communities in future TEPs. MP will also include a discussion on what gaps may remain. (CEGs, [Minnesota Power](#), [Department](#))

18. Require Minnesota Power to include a discussion of their coordination between EVs, energy efficiency, and building electrification planning, including their Energy Conservation and Optimization programs in future TEPs. (CEGs, [Minnesota Power Department](#))
19. Require Minnesota Power to include a discussion on electric school buses, including a count of any known electrified buses, with its next TEP. (Staff, [Minnesota Power](#))
CEG recommended combining DO 19 with DO 16
Department preferred 16, but supported if 16 is not adopted

MINNESOTA POWER
INTEGRATED DISTRIBUTION PLAN

DOCKET NO. 23-258

PREFERRED DECISION OPTIONS for JULY 2, 2024

1	Accept Minnesota Power's 2023 IDP Report as in compliance with IDP reporting requirements. Acceptance of the 2023 IDP has no bearing on prudence nor certification under Minn. Stat. § 216B.2425, subd. 3. (Minnesota Power)	Support
2	Accept Minnesota Power's 2023 IDP report as in compliance with IDP reporting requirements contingent on the Company making additional filings as noted below. Acceptance of the 2023 IDP has no bearing on prudence nor certification under Minn. Stat. § 216B.2425, subd. 3. (Department)	No Position
2a	Require Minnesota Power to file separate cost-benefit analyses for FLISR, the Smart Sensor Program, OMS, and GIS, through supplemental filings within 180 days of the Order. (Department)	Oppose
3	Require Minnesota Power in its next IDP to develop a suite of metrics to track resiliency, including SAIDI with MEDs and SAIFI with MEDs, and other metrics to the extent warranted. (Department)	Oppose
4	Require Minnesota Power to provide a proposal for measuring the capacity, reliability, ratepayer, and equity impacts of its distribution grid investments in its next IDP. This proposal shall specifically address the level of granularity at which Minnesota Power will evaluate these impacts for each budget category, including for each category whether Minnesota Power plans to measure these impacts at the level of the budget category, program, project, or at some other level of resolution, or not at all, and specifically accounting for the impact of any expected changes to IDP budget categories. (Department)	No Position
5	Delegate authority to the Executive Secretary to work with Minnesota Power and stakeholders to discuss metrics reported across distribution dockets, and delegate authority to the Executive Secretary to approve via notice a stakeholder agreement on metrics reporting if one is reached. At minimum, the proposal and metrics should include the following components:	Support
5a	Reliability metrics such as SAIDI, SAIFI, CAIDI, CEMI, and CELI	No Position
5b	Distribution spending by IDP budget categories	Support
5c	Whether there is available hosting capacity for generation or load at the primary system level	Support
5d	Demographic data including race and income	No Position
5e	Installed DERs, ECO rebates, DR customers enrolled in programs, etc.	No Position
5f	Metrics reported at a feeder and/or census block group level	No Position
6	Require Minnesota Power to make a supplemental filing within [180 days] of the Order in this docket that proposes a plan to accelerate beneficial electrification for its customers, including a discussion of how to incentivize dual fuel adoption for space heating and electrification of water heating, and provide forecasts of expected grid impacts of the same. (Department)	Oppose

Minnesota Power Preferred Decision Options

7	Delegate Authority to the Executive Secretary to work with Minnesota Power, the Department, and stakeholders to modify the IDP filing requirements to include discussions of the impacts of electrification where appropriate. Delegate authority to the Executive Secretary to approve via notice a stakeholder agreement on amended filing requirements if one is reached. (Staff)	Support
8	Accept Minnesota Power's current NWA analysis and find it is compliant with the Filing Requirement 3.E.2.d and 3.E.2.b. (Minnesota Power, Staff)	Support
9	Find that Minnesota Power's current NWA analysis is not compliant with the Filing Requirement 3.E.2.d and 3.E.2.b. (Department)	Oppose
10	Require Minnesota Power in its next IDP to file a comprehensive NWA evaluation process. (Department)	No Position
11	Require Minnesota Power in its next IDP to consider demand response, energy efficiency, and renewable generation as part of its future NWA process. (Department)	Support
12	Require Minnesota Power to provide cost-benefit analysis for the Cloquet Area project through a supplemental filing within 180 days of the Commission's Order. (Department)	Support
13	Approve Minnesota Power's 2023 Transportation Electrification Plan. (Minnesota Power, Department, Clean Energy Groups)	Support
14	Require Minnesota Power to file its next TEP by November 1, 2025. (Staff)	Support
15	Require Minnesota Power to file a residential EV managed charging program that does not require second service or participation in a whole-home time of use rate on or before the date of their next Transportation Electrification Plan. (CEGs)	Oppose
16	Require Minnesota Power to include a discussion of how the Company is preparing and supporting adoption of medium- and heavy-duty electric vehicles, specifically transit buses, school buses, and trucks in their future TEPs. (CEGs)	Support
17	Require Minnesota Power to include a discussion of equity and an analysis of how the Company's EV programs are serving communities disproportionately impacted by transportation pollution including renters, multifamily housing residents, communities of color, "low-to-moderate income" customers, and rural communities in future TEPs. MP will also include a discussion on what gaps may remain. (CEGs)	Support
18	Require Minnesota Power to include a discussion of their coordination between EVs, energy efficiency, and building electrification planning, including their Energy Conservation and Optimization programs in future TEPs. (CEGs)	Support
19	Require Minnesota Power to include a discussion on electric school buses, including a count of any known electrified buses, with its next TEP. (Staff)	Support

Department of Commerce - Decision Options for Individual Briefing papers for MP

MINNESOTA POWER IDP E015/M-23-258	DOC Position
1. Accept Minnesota Power's 2023 IDP Report as in compliance with IDP reporting requirements. Acceptance of the 2023 IDP has no bearing on prudence nor certification under Minn. Stat. § 216B.2425, subd. 3.	
ALTERNATIVE TO 1 2. Accept Minnesota Power's 2023 IDP report as in compliance with IDP reporting requirements contingent on the Company making additional filings as noted below. Acceptance of the 2023 IDP has no bearing on prudence nor certification under Minn. Stat. § 216B.2425, subd. 3. a. Require Minnesota Power to file separate cost-benefit analyses for FLISR, the Smart Sensor Program, OMS, and GIS, through supplemental filings within 180 days of the Order.	Support.
Modification for Future IDPs. 3. Require Minnesota Power in its next IDP to develop a suite of metrics to track resiliency, including SAIDI with MEDs and SAIFI with MEDs, and other metrics to the extent warranted.	Support.
Modification for Future IDPs. 4. Require Minnesota Power to provide a proposal for measuring the capacity, reliability, ratepayer, and equity impacts of its distribution grid investments in its next IDP. This proposal shall specifically address the level of granularity at which Minnesota Power will evaluate these impacts for each budget category, including for each category whether Minnesota Power plans to measure these impacts at the level of the budget category, program, project, or at some other level of resolution, or not at all, and specifically accounting for the impact of any expected changes to the IDP budget categories.	Support.
Modification for Future IDPs. 5. Delegate authority to the Executive Secretary to work with Minnesota Power and stakeholders to discuss metrics reported across distribution dockets, and delegate authority to the Executive Secretary to approve via notice a stakeholder agreement on metrics reporting if one is reached. At minimum, the proposal and metrics should include the following components: a. Reliability metrics such as SAIDI, SAIFI, CAIDI, CEMI, and CELI b. Distribution spending by IDP budget categories c. Whether there is available hosting capacity for generation or load at the primary system level d. Demographic data including race and income e. Installed DERs, ECO rebates, DR customers enrolled in programs, etc. f. Metrics reported at a feeder and/or census block group level	This is discussed in the joint briefing papers. Support. The Department appreciates the opportunity to revise the reporting requirements of all IDPs ahead of the next filing, which is an advantage over our initial proposal. We suggest that the stakeholder process includes all four rate-regulated utilities.
Modification for Future IDPs. 6. Require Minnesota Power to make a supplemental filing within [180 days] of the Order in this docket that proposes a plan to accelerate beneficial electrification for its customers, including a discussion of how to incentivize dual fuel adoption for space heating and electrification of water heating, and provide forecasts of expected grid impacts of the same.	Support.
Modification for Future IDPs. 7. Delegate Authority to the Executive Secretary to work with Minnesota Power, the Department, and stakeholders to modify the IDP filing requirements to	Oppose

Department of Commerce - Decision Options for Individual Briefing papers for MP

include discussions of the impacts of electrification where appropriate. Delegate authority to the Executive Secretary to approve via notice a stakeholder agreement on amended filing requirements if one is reached.	
Non-Wires Alternatives 8. Accept Minnesota Power's current NWA analysis and find it is compliant with the Filing Requirement 3.E.2.d and 3.E.2.b.	Oppose.
Non-Wires Alternatives 9. Find that Minnesota Power's current NWA analysis is not compliant with the Filing Requirement 3.E.2.d and 3.E.2.b.	Support.
Non-Wires Alternatives 10. Require Minnesota Power in its next IDP to file a comprehensive NWA evaluation process.	Support.
Non-Wires Alternatives 11. Require Minnesota Power in its next IDP to consider demand response, energy efficiency, and renewable generation as part of its future NWA process.	Support.
Non-Wires Alternatives 12. Require Minnesota Power to provide cost-benefit analysis for the Cloquet Area project through a supplemental filing within 180 days of the Commission's Order.	Support
Transportation Electrification Plan 13. Approve Minnesota Power's 2023 Transportation Electrification Plan.	Support.
Transportation Electrification Plan 14. Require Minnesota Power to file its next TEP by November 1, 2025.	Support. This DO is consistent with what was ordered in Xcel's TEP.
Transportation Electrification Plan 15. Require Minnesota Power to file a residential EV managed charging program that does not require second service or participation in a whole-home time of use rate on or before the date of their next Transportation Electrification Plan.	Support.
Transportation Electrification Plan 16. Require Minnesota Power to include a discussion of how the Company is preparing and supporting adoption of medium- and heavy-duty electric vehicles, specifically transit buses, school buses, and trucks in their future TEPs.	Support.
Transportation Electrification Plan 17. Require Minnesota Power to include a discussion of equity and an analysis of how the Company's EV programs are serving communities disproportionately impacted by transportation pollution including renters, multifamily housing residents, communities of color, "low-to-moderate income" customers, and rural communities in future TEPs. MP will also include a discussion on what gaps may remain.	Support.
Transportation Electrification Plan 18. Require Minnesota Power to include a discussion of their coordination between EVs, energy efficiency, and building electrification planning, including their Energy Conservation and Optimization programs in future TEPs.	Support.
Transportation Electrification Plan 19. Require Minnesota Power to include a discussion on electric school buses, including a count of any known electrified buses, with its next TEP.	Oppose, if 16 is adopted. Otherwise Support.

[23-258] Minnesota Power TEP – Clean Energy Groups – Decision Options

Summary:

CEGs support DOs 13, 14, 15, 16, 17, 18.

CEGs take no position on all remaining DOs

CEGs propose modifying DO 16 to be more inclusive of DO 19.

ALTERNATIVE DECISION OPTION:

We believe Decision Option 19 can be reflected in Decision Option 16. We propose deleting Decision Option 19 and Modifying Decision Option 16 to read:

16. Require Minnesota Power to include a discussion of how the Company is preparing and supporting adoption of medium- and heavy-duty electric vehicles, specifically transit buses, school buses, and trucks in their future TEPs, **and a count of each named category domiciling in the Company's service territory (e.g. number of transit buses, number of school buses, and number of trucks)** (CEGs)

Decision Option #	Decision Option Language	Support/Do Not Support/No Position
IDP ACCEPTANCE	The Commission must select DO 1 or DO 2	
1	Accept Minnesota Power's 2023 IDP Report as in compliance with IDP reporting requirements. Acceptance of the 2023 IDP has no bearing on prudence nor certification under Minn. Stat. § 216B.2425, subd. 3. (Minnesota Power)	NO POSITION
2	Accept Minnesota Power's 2023 IDP report as in compliance with IDP reporting requirements contingent on the Company making additional filings as noted below. Acceptance of the 2023 IDP has no bearing on prudence nor certification under Minn. Stat. § 216B.2425, subd. 3. (Department) A. Require Minnesota Power to file separate cost-benefit analyses for FLISR, the Smart Sensor Program, OMS, and GIS, through supplemental filings within 180 days of the Order. (Department) <i>Staff notes the Department determined Minnesota Power's NWA was not compliant with the filing objects, Staff listed all NWA related DOs together for clarity.</i>	NO POSITION

Clean Energy Groups

MODIFICATIONS FOR FUTURE IDPs	The Commission may select DO 3 AND/OR 4, OR DO 5, or none of the options.	
3	Require Minnesota Power in its next IDP to develop a suite of metrics to track resiliency, including SAIDI with MEDs and SAIFI with MEDs, and other metrics to the extent warranted. (Department)	NO POSITION
4	Require Minnesota Power to provide a proposal for measuring the capacity, reliability, ratepayer, and equity impacts of its distribution grid investments in its next IDP. This proposal shall specifically address the level of granularity at which Minnesota Power will evaluate these impacts for each budget category, including for each category whether Minnesota Power plans to measure these impacts at the level of the budget category, program, project, or at some other level of resolution, or not at all, and specifically accounting for the impact of any expected changes to IDP budget categories. (Department)	NO POSITION
5	<p>Delegate authority to the Executive Secretary to work with Minnesota Power and stakeholders to discuss metrics reported across distribution dockets, and delegate authority to the Executive Secretary to approve via notice a stakeholder agreement on metrics reporting if one is reached. At minimum, the proposal and metrics should include the following components:</p> <ul style="list-style-type: none"> a. Reliability metrics such as SAIDI, SAIFI, CAIDI, CEMI, and CELI b. Distribution spending by IDP budget categories c. Whether there is available hosting capacity for generation or load at the primary system level d. Demographic data including race and income e. Installed DERs, ECO rebates, DR customers enrolled in programs, etc. f. Metrics reported at a feeder and/or census block group level (Staff) 	NO POSITION
SAME SECTION	The Commission may select either DO 6 OR DO 7, or neither.	

Clean Energy Groups

6	Require Minnesota Power to make a supplemental filing within [180 days] of the Order in this docket that proposes a plan to accelerate beneficial electrification for its customers, including a discussion of how to incentivize dual fuel adoption for space heating and electrification of water heating, and provide forecasts of expected grid impacts of the same. (Department)	NO POSITION
7	Delegate Authority to the Executive Secretary to work with Minnesota Power, the Department, and stakeholders to modify the IDP filing requirements to include discussions of the impacts of electrification where appropriate. Delegate authority to the Executive Secretary to approve via notice a stakeholder agreement on amended filing requirements if one is reached. (Staff)	NO POSITION
NON-WIRES ALTERNATIVES	The Commission must select either DO 8 OR DO 9	
8	Accept Minnesota Power's current NWA analysis and find it is compliant with the Filing Requirement 3.E.2.d and 3.E.2.b. (Minnesota Power, Staff)	NO POSITION
9	Find that Minnesota Power's current NWA analysis is not compliant with the Filing Requirement 3.E.2.d and 3.E.2.b. (Department)	NO POSITION
10	Require Minnesota Power in its next IDP to file a comprehensive NWA evaluation process. (Department)	NO POSITION
SAME SECTION	The Commission may select DO 11 or 12, or neither option	
11	Require Minnesota Power in its next IDP to consider demand response, energy efficiency, and renewable generation as part of its future NWA process. (Department)	NO POSITION
12	Require Minnesota Power to provide cost-benefit analysis for the Cloquet Area project through a supplemental filing within 180 days of the Commission's Order. (Department)	NO POSITION

Clean Energy Groups

TRANSPORTATION ELECTRIFICATION PLAN	The Commission should select DO 13 and 14	
13	Approve Minnesota Power’s 2023 Transportation Electrification Plan. (Minnesota Power, Department, Clean Energy Groups)	SUPPORT
14	Require Minnesota Power to file its next TEP by November 1, 2025. (Staff)	SUPPORT
SAME SECTION	The Commission may select any combination of DO 15-20, or none of the options	
15	Require Minnesota Power to file a residential EV managed charging program that does not require second service or participation in a whole-home time of use rate on or before the date of their next Transportation Electrification Plan. (CEGs)	SUPPORT
16	Require Minnesota Power to include a discussion of how the Company is preparing and supporting adoption of medium- and heavy-duty electric vehicles, specifically transit buses, school buses, and trucks in their future TEPs. (CEGs)	SUPPORT
17	Require Minnesota Power to include a discussion of equity and an analysis of how the Company’s EV programs are serving communities disproportionately impacted by transportation pollution including renters, multifamily housing residents, communities of color, “low-to-moderate income” customers, and rural communities in future TEPs. MP will also include a discussion on what gaps may remain. (CEGs)	SUPPORT
18	Require Minnesota Power to include a discussion of their coordination between EVs, energy efficiency, and building electrification planning, including their Energy Conservation and Optimization programs in future TEPs. (CEGs)	SUPPORT
19	Require Minnesota Power to include a discussion on electric school buses, including a count of any known electrified buses, with its next TEP. (Staff)	NO POSITION – we are aligned with this DO but believe it is included in DO 16. For clarity, alternative DO proposed below.

ALTERNATIVE DECISION OPTION:

Delete Decision Option 19 and Modify Decision Option 16 to read:

Require Minnesota Power to include a discussion of how the Company is preparing and supporting adoption of medium- and heavy-duty electric vehicles, specifically transit buses, school buses, and trucks

Clean Energy Groups

in their future TEPs, and a count of each named category domiciling in the Company's service territory (e.g. number of transit buses, number of school buses, and number of trucks) (CEGs)