

To: Daniel P. Wolf, Executive Secretary
Minnesota Public Utilities Commission
121 7th PI E #350, St Paul, MN 55101

February 28, 2018

CURE – Communities United for Responsible Energy Comments to:

Docket E999/M-17-377 Minnesota Biennial Transmission Project Report
Docket E002/M-17-776 Xcel's 2017 Biennial Grid Modernization Report
Docket 002/M-17-777 Xcel's Distribution System Hosting Capacity Report

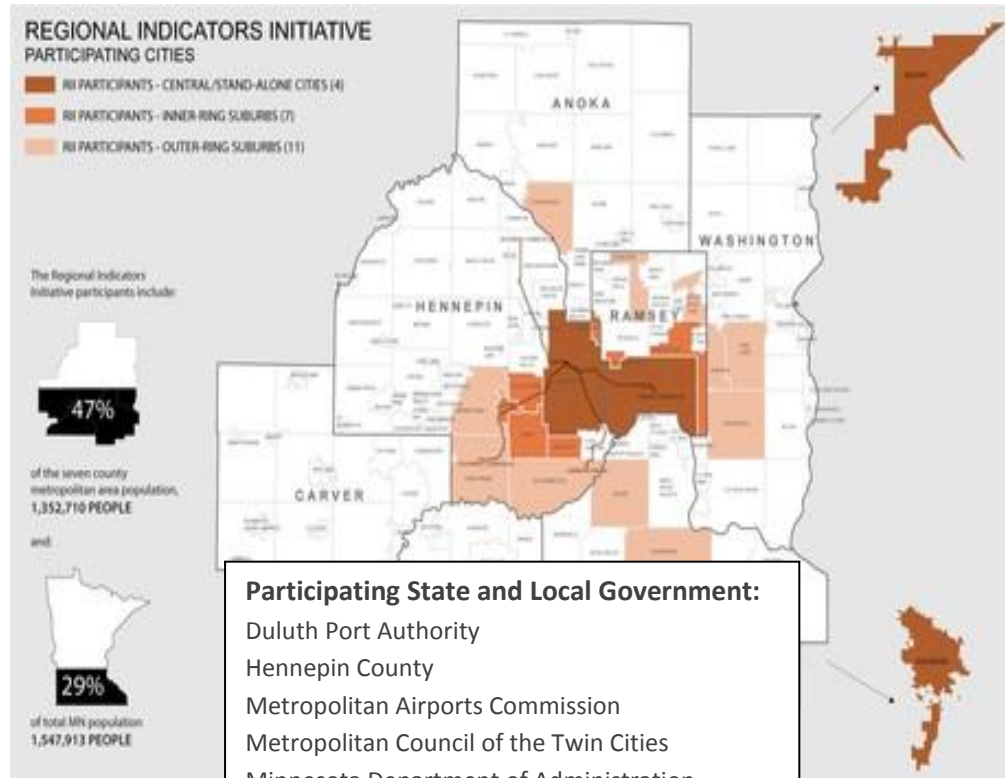
Dear Mr. Wolf,

We have submitted our transmission and distribution planning supplemental and reply comments to the three dockets above. One of the chief points in our primary comments to M-17-377, is that these dockets are interconnected. All are key to public partner engagement in Grid Modernization and integrated system planning. Our chief requests are that the Commission consider the following

- 1) Take next steps as discussed below, outlined in the Commission's 2016 reports – **Integrated Distribution Planning**, prepared for the Commission by ICF International (Sponsored by DOE) <https://energy.gov/sites/prod/files/2016/09/f33/DOE%20MPUC%20Integrated%20Distribution%20Planning%2008312016.pdf> ; and the 2016 **PUC Staff Report on Grid Modernization** http://gridworks.org/wp-content/uploads/2015/06/MNPUC_Staff_Report_on_Grid_Modernization_March2016.pdf
Our comments (1-16)-- **IV. A-H** -- are based upon these report recommendations.
- 2) **Initiate an integrated system planning docket**, to enable and coordinate top down and bottom up grid planning; create meaningful access for local government and community players; and effective integration of new technologies – (e.g. storage and EVs). Our only contention with the PUC Staff 2016 report is the report's sense of timing for the goal of developing an integrated system planning. Embarking on this process is urgent. It cannot wait for several more rounds of disintegrated reports and plans. Investments are being made. Commission action is crucial.
- 3) **The Hosting Capacity Study and Distribution Grid Modernization** have everything to do with facilitating statewide development and benefits . They should become part of an integrated transmission and distribution planning docket as soon as possible.
- 4) A first priority is for the Commission to provide direction for **access to hosting capacity detail** in accordance with statute 216B.2426 Opportunities for Distributed Generation , including mapping.
- 5) **Reactivate Zonal Public Planning Meetings and begin the process of integrated planning for Grid Modernization.** *This is the time* to implement the realignment of zonal public meetings with energy initiatives and local government planning around the state.

- 6) **Where to begin?** We are submitting an attachment of the original “MN State Plan Team” **diagram**, used by the MTOs for their state transmission planning concept. It shows the MTO State Plan Team hub with spokes to each planning zone, with **local government partners** for each zone. This is the right place to begin. Resources immediately available to be applied to partnering with local government include:
- Minnesota’s Clean Energy Resource Teams <https://www.cleanenergyresourceteams.org/>
 - Local government associations
 - Minnesota’s LoGoPEP – Local Government Project for Energy Planning --with a guide: https://www.regionalindicatorsmn.com/.../pdf.../energyplanningguide_april2017.pdf
 - LoGoPEP** sponsorship includes utilities, state regulators and support from a key team of NGOs who are now working to refine and expand energy planning tools for local governments to cities in Greater Minnesota.

The LoGoPEP Greater Minnesota expansion will collect energy and travel data for more than 90 cities in the state. <https://www.regionalindicatorsmn.com/energy-planning>



- Participating State and Local Government:**
- Duluth Port Authority
 - Hennepin County
 - Metropolitan Airports Commission
 - Metropolitan Council of the Twin Cities
 - Minnesota Department of Administration
 - Minnesota Department of Employment and Economic Development
 - Minnesota Department of Natural Resources
 - Minnesota Department of Transportation
 - Minnesota Pollution Control Agency
 - Rochester International Airport
 - U.S. Energy Information Administration
 - University of Minnesota
 - ICLEI Local Governments for Sustainability

Participating Cities:

Bloomington	Minnetonka
Coon Rapids	Oakdale
Duluth	Richfield
Eagan	Rochester
Eden Prairie	Rosemount
Edina	St. Paul
Falcon Heights	Shoreview
Hopkins	Saint Anthony
Lake Elmo	St. Louis Park
Maplewood	White Bear Lake
Minneapolis	Woodbury

Public and Private Utilities:

Anoka Municipal Utility
CenterPoint Energy
Connexus
Dakota Electric Association
Duluth Comfort Systems
Duluth Steam Cooperative
Great River Energy
Henn. Energy Recovery Center
Minnesota Energy Resources
Minnesota Power
Minnesota Valley Electric Co-Op
NRG Energy
Olmsted County Waste to Energy Facility
Rochester Public Utility
St. Paul District Energy
University of Minnesota (Southeast Steam)
Western Lake Superior Sanitation District
Xcel Energy

Primary Funders:

Minnesota Pollution Control Agency
Minnesota Department of Commerce
Urban Land Institute MN
Great Plains Institute

Team Members:

LHB Inc.
ORANGE Environmental, LLC

Further Conversation and Collaboration:

The 21st energy economy features shared responsibility for investments in innovative technologies and climate change strategies. Rapid adoption of game changing technologies, like batteries, EVs, and the expansion of behind the meter generation – makes the coordination of shared planning for transmission and distribution critical for Grid Modernization. My hope is that the Commission and these dockets will create further opportunities for creative and meaningful engagement in energy, transmission and distribution planning, for all those interested.

Thank you to those of you who agreed to talk with me, and provide your perspectives:

- Will Kaul - (Semi-retired) VP and chief transmission officer at GRE
- Annie Levinson-Falk – Executive Director, MN Citizen’s Utility Board (CUB)
- Lissa Pawlish (and team) – Director, MN Clean Energy Resource Teams (CERTS)
- Mike Michaud , Consultant (formerly PUC, DOC, EQB and VP of Engineering for Juhl Wind Inc)
- George Crocker – North American Water Office, CBED pioneer
- Timothy DenHerder –Thomas - General Manager, Cooperative Energy Futures
- Abby Finis – Great Plains Institute, Green Step Cities and LoGoPEP

A special thanks to Gordon Pietsch, Director of Transmission planning and operations for GRE.

These comments are respectfully submitted, with good will and thanks to all parties and participants. The views expressed in these comments are mine.

Sincerely,

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