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PUBLIC UTILITIES COMMISSION**

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**In the Matter of Xcel Energy’s 2020-2034
Upper Midwest Resource Plan**

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PUC Docket No. E002/RP-19-368

**REPLY COMMENTS OF VOTE SOLAR, THE INSTITUTE FOR LOCAL SELF
RELIANCE, COOPERATIVE ENERGY FUTURES,
AND THE ENVIRONMENTAL LAW & POLICY CENTER**

Vote Solar (“VS”), the Institute for Local Self Reliance (“ILSR”), Cooperative Energy Futures (“CEF”) and the Environmental Law and Policy Center (“ELPC”), collectively the Distributed Solar Parties (“DSP”) provide these Reply Comments to the Initial Comments of other parties on Xcel Energy’s (“Xcel” or the “Company”) 2020–2034 Upper Midwest Resource Plan in Docket No. E002/RP-19-368.

As described in our Initial Comments, the Distributed Solar Parties worked closely with the Sierra Club to develop and include the Distributed Generation as a Resource (DGR) model included in their *Clean Energy for All* (“CEFA”) plan. Sierra Club did excellent work and we appreciate their continued efforts in this docket. We have no additional comments on CEFA at this point but reserve the right to provide additional comments based on Xcel’s revised plans expected with its reply comments.

These Reply Comments focus on important points made by the Citizens Utility Board, the City of Minneapolis, and the Energy Efficiency for All partners. Each of these organizations raises important issues that we wish to highlight. As a general matter, we address commonalities between these parties and DSP regarding the treatment of distributed generation, the conclusions related to the value of distributed generation in the Company’s plan, and the Company’s approach to equity in the Plan.

In addition to the specific issues addressed in these Reply Comments, the Distributed Solar Parties generally support the findings and recommendations of the Clean Energy Organizations. Omission of a specific reply to other parties in these Comments is not intended, and should not be interpreted, as agreement with those comments.

Reply To City of Minneapolis

The City of Minneapolis's comments highlight several factors consistent with Distributed Solar Parties' comments and further reinforce the importance of increasing the distributed solar component of Xcel Energy's resource plan.

First, the City notes the strong desire from its residents and businesses to access distributed energy jobs and community ownership models. Xcel Energy's own comments in the COVID relief docket confirm that distributed solar resources create far more jobs per megawatt of capacity than utility-scale solar projects. Additionally, the scale and cost of individual distributed solar projects is more in line with the financial and organizational capacity of community ownership, as seen with community solar projects owned by Cooperative Energy Futures members, for example.

Second, the City of Minneapolis notes that several cities served by Xcel Energy have local clean electricity aims. Meeting these goals will produce 580 megawatts of new distributed solar just within the boundaries of Minneapolis, Saint Paul, St. Louis Park, Eden Prairie, Northfield, and Red Wing. As the City notes, Xcel Energy's current distributed solar forecast falls short of the amount of distributed solar needed to meet those goals unless one unreasonably assumes no distributed solar deployment outside these six jurisdictions. This is further evidence that Xcel's distributed resource projections are too low.

Finally, the City notes a preference for competitive, all-source procurement. The model developed by the Distributed Solar Parties is consistent with that proposal and provides a unique way to accurately price and select distributed solar as part of resource planning. It suggests that, with the right pricing, more distributed solar could be procured and costs to customers would be lower than in alternative scenarios.

Reply to Energy Efficiency for All Partners

Fresh Energy, Community Stabilization Project, Green & Healthy Homes Initiative, Inquilinx Unidxs Por Justicia, Minnesota Housing Partnership, National Housing Trust, and Natural Resources Defense Council jointly submitted Comments as the Energy Efficiency for All partners ("EEFA partners"). The Distributed Solar Parties agree with all of the recommendations made by the EEFA partners and offer the following comments on the EEFA recommendations

with respect to Procedural Equity, the Environmental Justice Accountability Board, and the equity considerations of the proposed Sherco CC.

Procedural Equity

The EEFA partners commended the Company for working toward equitable outcomes in both this and related proceedings (such as the locational reliability and equity working taking place through the performance-based ratemaking and Xcel's service quality and reliability dockets). They note that full equity must include both "the elimination of barriers to full participation in the *process*, and access to the full benefits of the outcome." (EEFA Comments, page 3). As such, they outlined three specific actions that would advance equity generally in the utility's processes and specifically in the context of resource planning.

The EEFA partners make several specific recommendations for making participation in regulatory exercises such as resource planning more accessible to all stakeholders, including renters, affordable rental property owners, BIPOC communities, and under-resourced individuals.

Environmental Justice Accountability Board

The EEFA partners urged the Commission to direct Xcel to support the formation of an environmental justice accountability board, which would develop environmental justice-focused initiatives to be incorporated throughout the utility.

The DSP strongly supports this recommendation and offers a specific model that the Commission and the Company could consider adapting to this use. In a recent settlement agreement approved in Michigan for DTE Electric Company's Voluntary Green Pricing Program, DTE agreed to create a Low-Income Solar Council ("LISC") to bring community involvement directly and institutionally to the Company's implementation of a low-income community solar program.¹ The LISC is described in the Memorandum of Understanding between the Company and settling parties filed with the Michigan Public Service Commission on April 14, 2021.²

¹ Order of the Michigan Public Service Commission in U-20713, *In the matter, on the Commission's own motion, regarding the regulatory reviews, revisions, determinations and/or approvals necessary for DTE ELECTRIC COMPANY to comply with Section 61 of 2016 PA 342*, and U-20851, *In the matter of DTE ELECTRIC COMPANY'S application for the regulatory reviews, revisions, determinations, and/or approvals to fully comply with Public Act 295 of 2008*, June 9, 2021. <https://mi-psc.force.com/sfc/servlet.shepherd/version/download/068t000000PPEkMAAX>

² Letter Filing U-20713 and U-20851 Memorandum of Understanding, April 14, 2021. <https://mi-psc.force.com/sfc/servlet.shepherd/version/download/068t000000MNTOqAAP>

While the DTE’s LISC is more narrowly focused on a discrete program than the broad EJ accountability board proposed by the EEFA partners, we believe that there are several important elements of the process and outcome of this DTE LISC that might prove valuable if the Commission agrees to adopt EEFA’s recommendation for an EJ accountability board, including:

- The LISC provides for the participation of members of affected communities in a decision-making body that has meaningful input into the operations
- The LISC includes utility, Commission, affected community participants, and subject matter experts from outside the utility.
- Community participants will be compensated for their participation and contributions.

If implemented correctly, the LISC will not only inform DTEs decision-making in an actual operational context but also create an opportunity for leadership development among community members and set a precedent for valuing and prioritizing community expertise.

The DSP encourages the Commission and Xcel to consider the example set by DTE Electric, the MPSC, and the settling parties in the DTE Voluntary Green Pricing Program case in adopting the recommendation of the EEFA Partners to establish an EJ accountability board.

Equity Considerations of the Sherco CC

Fourth, the EEFA partners support the recommendation to remove the Sherco CC gas plant from the plan. In addition to the financial and reliability arguments against the plant made by other parties, the EEFA partners argue that the proposed plant would disproportionately harm Minnesota BIPOC and under-resourced communities.

Reply to Citizens Utility Board

The Citizens Utility Board of Minnesota (“CUB”) retained Vibrant Clean Energy (“VCE”), a leading expert in power systems modeling, to develop CUB’s *Consumers Plan* using the WIS:dom® -P model. WIS:dom® -P is a state of art capacity expansion and production cost model that simultaneously co-optimizes utility-scale generation, storage, transmission, distributed energy resources (including distributed generation and distributed storage), flexible load, and the distribution grid to produce the least-cost, low-carbon solutions. That analysis addresses the interplay between system elements at different levels whose interactions are not captured by traditional resource modeling. WIS:dom® -P can dynamically optimize the entire system to identify efficiencies and opportunities that are normally lost. Fundamentally, the WIS:dom® -P model disaggregates DER on the distribution system, and then presents those technologies at the interface between the bulk power system and distribution system. As a result, DER coordinates to shape and shift demand, and bulk power system resources coordinate to meet the load that appears at the interface.

CUB’s analysis based on WIS:dom® -P provides significant and necessary analysis of the full picture to this proceeding. In many important respects, CUB’s *Consumers Plan* mirrors the findings of the Clean Energy Organizations and the Sierra Club. In general, the aligned parties find that early retirement of coal plants, no new natural gas plant, and increased deployment of renewable energy, energy storage, energy efficiency, and demand response. The fact that CUB and the DSP/Sierra Club arrived at similar conclusions using different modeling tools provides additional credence to both sets of conclusions. The DSP also note that modeling based on WIS:dom® -P produces cost *savings* - not only due to coal fleet retirements but also due to savings on distribution system cost (both deferred distribution system upgrades as well as increased system utilization). The DSP supports CUB’s analytical approach and the co-optimization of distribution and bulk power systems to meet overall system needs over the plan period - and note that CUB’s approach suggests a need for Xcel’s distribution and resource planning functions to more closely coordinated to meet system needs over the plan period.

Utility-Scale Solar Buildout

The CUB plan builds 6,529 MW of solar, including 2,589 MW of distributed PV (“DPV” - discussed in more detail below) over 15 years. Figure 3.7 from the *Consumers Plan* builds significant amounts of renewables through 2035.

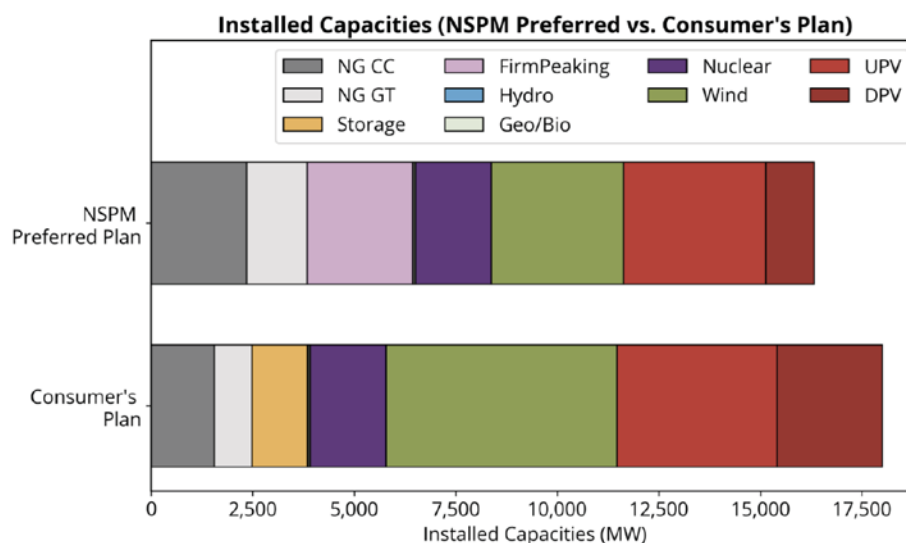
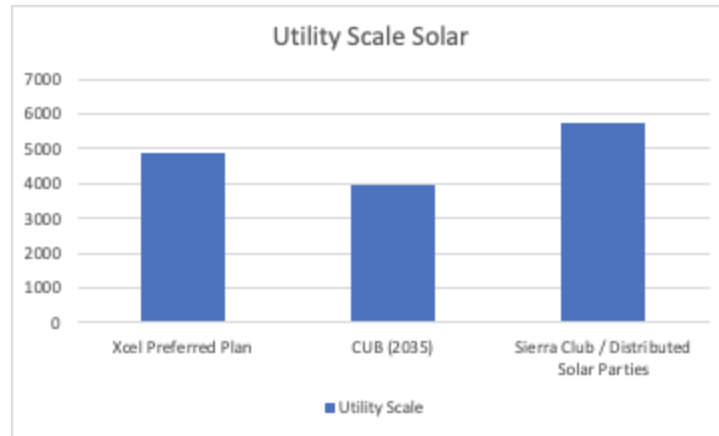


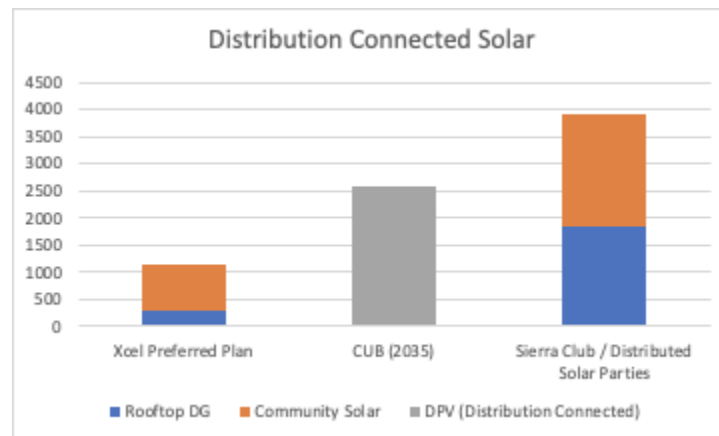
Figure 3.7: Comparison of installed capacities from the NSPM Preferred Plan (year 2034) to Consumers Plan (year 2035).

One consistent finding across the Clean Energy Organizations, the Citizens Utility Board, the Sierra Club & DSP, and Xcel’s Preferred Plan is a significant buildout of utility-scale solar across the analysis period.



Buildout of Distributed Solar

Unlike the similar amounts of utility-scale solar across the three plans (Xcel’s Preferred, CUB, and Sierra Club/DSP Clean Energy for All), Xcel’s Preferred Plan contains significantly less distributed solar than the other two. Because of the way CUB’s WIS:dom® -P models solar, it does not differentiate between customer-sited behind-the-meter solar (rooftop DG), small wholesale distribution connected projects (such as might occur through PURPA or the DG Tariff), and Community Solar. The WIS:dom® -P output recommends an aggregate amount of “Distributed PV” or “DPV”, which includes all the distribution connected categories listed above. In comparison, the Sierra Club/DSP plan identifies different categories of distributed solar. However, both the CUB and the Sierra Club/DSP results show significantly more distributed solar than Xcel.



This convergence of results between CUB and Sierra Club/DSP using different modeling tools demonstrates the value of a significant expansion of distribution connected solar. The Commission and stakeholders should consider the implications of these results to not only

determine the best plan in this IRP but in planning for a future with increased distribution system planning in the future.

Co-optimization

One of the key aspects of the WIS:dom® -P model from which many key benefits flow is the concept of “co-optimization”

The Consumers Plan unlocks increased efficiency through the co-optimization of the distribution system with the bulk power system. This co-optimization, which allows distributed energy resources (DER) to reshape demand and utility-scale generation to serve that demand more effectively, results in a total of 2.6 GW of distributed PV and 1.4 GW of distributed storage by 2035. (CUB Initial Comments p. 3)

Savings from co-optimization come from different places:

While a large share of the cost savings in the Consumers Plan are a result of retiring the coal fleet, the distribution system similarly provides substantial cost savings. Even as new load is added to the system due to newly electrified appliances and vehicles, distribution system costs steadily decrease as a result of deferred distribution system upgrades and increased throughput.

...

The model moves much of the action to the distribution system. DER mean that the net load served by utility resources actually goes down: In the Consumers Plan modeling, Xcel must meet a peak system load of 6,900 MW in 2040, a 24.7% decrease relative to today’s 9,164 MW peak, as a result of DER shifting or shaping the load to decrease demand.

...

The Consumers Plan utilizes WIS:dom’s unique ability to co-optimize distribution-level system operations with grid-scale generation and transmission. WIS:dom disaggregates DER on the distribution system, and then presents those technologies at the “grid edge,” where electricity passes across to the bulk power system (on transmission lines larger than 69 kV).

CUB Initial Comments pp. 12, 15, 16.

Another important implication of co-optimization arises in the context of the Commission’s interest in performance-based ratemaking (“PBR”). Co-optimization of distribution and bulk

power systems, including a significant increase in distributed solar, aligns with the Commission's January 8, 2019 Order *In the Matter of a Commission Investigation to Identify and Develop Performance Metrics, and Potentially, Incentives for Xcel Energy's Electric Utility Operations* (Docket No. E-002/CI-17-401). In that Order the Commission established five regulatory goals:

- Affordability;
- Reliability, including both customer and system-wide perspectives
- Customer service quality, including satisfaction, engagement and empowerment;
- Environmental performance, including carbon reductions and beneficial electrification; and
- Cost effective alignment of generation and load, including demand response.

Co-optimization and increased distributed generation produce better results under each of these metrics than Xcel's current modeling and plans. The Commission should consider the implications of CUB and Sierra Club/DSP's results in setting performance incentives in the context of setting performance incentives for Xcel in the future in the PBR docket.

Equity and DER Expansion

CUB's WIS:dom® -P results also demonstrate the important implications that distributed solar has for equity:

Despite suggestions that DER burden other ratepayers with increased distribution costs, WIS:dom modeling suggests that this expansion largely serves to benefit all ratepayers and mitigate costs and grid impacts. In order to achieve these benefits, Xcel and the Commission should carefully evaluate appropriate mechanisms to encourage thoughtful and equitable DER expansion.

CUB Initial Comments at 17-18. That is consistent with the Commission's prior findings (and those of other jurisdictions) regarding the value of distributed solar and with the Sierra Club/DSP results in this docket.

Reply to Department of Commerce

The Department of Commerce (DOC) contends that all-resource bidding in 2021 and beyond is inappropriate because a limited number of all-resource bidding efforts twenty years ago were not successful. (DOC Public Initial Comments at 98-99.) Instead, DOC recommends continuing a two-track bidding process to fulfill the IRP-identified needs. *Id.* DOC also contends that preserving the present bidding process is necessary to preserve the continued relevance of the IRP process itself. *Id.*

The Distributed Solar Parties do not agree that results twenty years ago reflect the current reality for all-resource bidding. Markets and technologies have changed dramatically in the last 20 years. Regulatory tools should evolve to meet market and technological changes. Preserving the current IRP process should not be a basis for sub-optimal resource procurement.

The current two-track process may be reasonable for conducting and evaluating specific bids but should not preclude the use of all-resource RFPs early in the planning process to inform the model inputs and overall plan. Pre-modeling, all-source RFPs can provide significant value in terms of price discovery and certainty and have been successfully used in other states.

Additionally, DOC contends that the result of all-resource bidding is a variety of bids for resources with different sizes, types and timing, which can only be compared through an unmanageable number of capacity expansion model permutations. *Id.* However, that is not consistent with the experience in other states, where all-source RFPs have been used successfully to inform resource planning around the region (recent RFPs and RFQs have been used in Michigan and Indiana to inform IRP processes). The Commission should investigate the benefits and uses of all-source RFPs to inform future resource plans.

Conclusions and Recommendations

The Distributed Solar Parties continue to urge the Commission to consider the financial, reliability and equity benefits that distributed energy resources generally and distributed solar specifically can bring to Xcel's resource planning process. In particular and in response to specific suggestions made by other parties in their initial Comments, we recommend:

- The Commission should adopt the suggestions and recommendations made by the City of Minneapolis with regard to the impact of Xcel's plans on the City's climate and equity goals.
- The Commission should require the Company to adopt the recommendations of the Energy Efficiency for All partners with respect to procedural equity, the Environmental Justice Accountability Board. In addition, the Commission should fully incorporate environmental justice and equity considerations into deliberations over the proposed Sherco combined cycle plant.
- The Commission should consider the convergence of findings related to the financial and environmental benefits of expanded distributed generation demonstrated by the similar findings of the Citizens Utility Board and the Sierra Club/Distributed Solar Parties modeling.
- The DSP recommend that the Commission initiate an investigation into the benefits and uses of all-source RFPs to inform future resource plans.

Thank you for your consideration.

Dated: June 25, 2021.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 25th day of June 2021, I have served the foregoing Reply Comments of Vote Solar, the Institute for Local Self Reliance, Cooperative Energy Futures, and the Environmental Law & Policy Center on the attached list of persons by depositing a true and correct copy by electronic filing.

Dated: June 25, 2021.

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