

**STATE OF MINNESOTA
PUBLIC UTILITIES COMMISSION**

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**In the Matter of Northern States Power)
Company’s, d/b/a Xcel Energy, 2020–) Docket No. E002/RP-19-368
2034 Upper Midwest Integrated)
Resource Plan**

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

Introduction and Background

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 Supplemental Comments in response to the Minnesota Public Utilities Commission’s (“Commission”) Notice of Supplemental Comment Period *In the Matter of Xcel Energy’s 2020–2034 Upper Midwest Integrated Resource Plan* in Docket No. E002/RP-19-368.

These Supplemental Comments primarily focus on the revised 2020–2034 Integrated Resource Plan filed by Xcel Energy (“Xcel” or the “Company”) on June 25, 2021 (“Alternate Plan”). We also briefly respond to the Reply Comments filed by the Company and by the Department of Commerce (“DOC”) on June 25, 2021 (“DOC Reply Comments”) as they pertain to the Distributed Generation as a Resource Model proposed by the DSP in our February 11, 2021, Initial Comments.

The Commission’s Notice of Supplemental Comment Period identified six topics open for comment.

1. Should the Commission approve, modify, or reject Xcel Energy’s Alternate Plan, as described in the Company’s June 25, 2021 Reply Comments?
2. If the Commission modifies the Alternate Plan, what modifications should the Commission make?

3. Should the Commission adopt a proposed alternative plan under Minn. R. 7843.0300 subp. 11? If so, provide a narrative with quantitative analysis supporting how the proposed changes are in the public interest, considering the factors listed in part 7843.0500, subp. 3.
4. What resource acquisition process(es) should Xcel use to implement the approved resource plan?
5. When should Xcel file its next IRP?
6. Are there other issues or concerns related to this matter?

Each topic is addressed below, in order, as to number of elements of the Alternate Plan. These comments focus primarily on distributed solar as a resource. Omission of discussion on any other topic does not constitute endorsement of positions taken by the Company or any other party.

Topic 1: Should the Commission approve, modify, or reject Xcel Energy's Alternate Plan, as described in the Company's June 25, 2021 Reply Comments?

The Commission should modify the Alternate Plan by requiring the Company to maximize cost-effective distributed energy resource potential.

The "headline" issues in the Alternate Plan represents an improvement compared to the original plan filed in June 2020 in many respects. The Sierra Club, Clean Energy Organizations, and Citizens Utility Board ("CUB") demonstrated, through three different but complimentary approaches, that the Sherco Combined Cycle gas plant is neither the most economic nor most reliable choice to meet customer needs. The Company's response appropriately abandons the Sherco Combined Cycle gas plant, accelerates retirement of coal plants, and expands renewable energy and efficiency. However, the Company's plan still ignores the benefits of distributed generation. As the DSP's *Distributed Generation as a Resource* ("DGR") model incorporated into Sierra Club's *Clean Energy for All* ("CEFA") plan shows, expanding more distributed generation would contribute to a reliable, cost-effective plan. Likewise, CUB demonstrated the co-optimization benefits of distribution-connected solar resources. Leveraging distribution-connected solar resources provides multiple benefits beyond the costs and benefits recognized in traditional resource planning and leveraging distribution-connected solar resources may in fact result in lower total system costs for all customers.

Our recommendations are discussed in response to Topic 2, below.

Topic 2: If the Commission modifies the Alternate Plan, what modifications should the Commission make?

Distributed Solar Parties' DGR model is included in Sierra Club's CEFA plan. Sierra Club did excellent work, and we appreciate their continued efforts in this docket. Accordingly, we continue to support the overall recommendations made by Sierra Club. The Commission should require the Company to include the DGR as modeled in Sierra Club's CEFA plan. The

Commission should also direct the Company to develop a pilot program to test the distributed generation adoption model proposed by the Distributed Solar Parties. As discussed below in Topic 6, the DSP acknowledge that more real-world experience with the proposed adoption model would be valuable and recommend that a two or three year pilot scale program beginning in 2023 would provide sufficient opportunity to test the proposed model.

Topic 3: Should the Commission adopt a proposed alternative plan under Minn. R. 7843.0300 subp. 11? If so, provide a narrative with quantitative analysis supporting how the proposed changes are in the public interest, considering the factors listed in part 7843.0500, subp. 3.

See the discussion of Topic 1 above.

Topic 4: What resource acquisition process(es) should Xcel use to implement the approved resource plan?

In the Alternate Plan, Xcel acknowledges that it will file separately for approval of certain resources identified in the plan. Consistent with recommendations made by the Sierra Club, the Clean Energy Organizations, and the CUB, the Commission should not approve the combustion turbines (“CTs”) proposed in the Alternate Plan. As the modeling by those organizations demonstrates, the Company can meet its resource requirements at a lower cost reflected in the plan including the CTs. Furthermore, given the “Replacement Resource” window that the Company has defined for Sherco 1 is 2027–2029, approving replacement resources can be reasonably deferred to a separate proceeding.¹ Any consideration of the Company’s black start justification for the proposed CTs can be considered in such separate proceedings.

The DSP recommend that the Commission also take action outside this docket to resolve issues currently inhibiting the development of small wholesale distribution connected solar resources through the Distributed Generation Tariff (“DG Tariff”). The DG Tariff was established by the Commission in its Order Establishing Standards in Docket No. E-999/CI-01-1023 on September 28, 2004. Attachment 6 of the 2004 Interconnection Standards is titled *Guidelines for Establishing the Terms of the Financial Relationship Between an Electric Utility and a Distributed Customer with No More than 10 MW of Capacity*. It includes a requirement that utilities must purchase all of the energy offered by the distributed generation customer, as well as the calculation of the costs that the utility was able to avoid because of the distributed generation facility’s output (avoided costs).

For a variety of reasons documented in the current Interconnection Standards docket (Docket No. 16-521 *In the Matter of Updating Generic Standards for Utility Tariffs for Interconnection and Operation of Distributed Generation Facilities Under Minn. Stat. § 216B.1611*) the process to update Attachment 6 has stagnated. The Commission solicited comments in March, 2019, and ordered utilities (including Xcel) to update their distributed generation tariffs in Docket No. 16-

¹ Alternate Plan at 20.

521. In Comments filed in October 2020 and Reply Comments filed in May 2021, in that docket, parties continue to urge the Commission to take action to revitalize the Distributed Generation Tariff. The Distributed Generation Tariff could facilitate the development of cost-effective distribution-connected solar resources as envisioned in both the Sierra Club's CEFA and CUB's *Consumers Plan*. Therefore, the DSP recommend that the Commission complete its consideration of the Distributed Generation Tariff, update the requirements for utility compliance with Attachment 6, and enable this important part of a healthy renewable energy market.

Topic 5: When should Xcel file its next IRP?

We suggest that the Commission require Xcel to file its next IRP two years after the Order in this proceeding approving, modifying or rejecting the Company's Alternate Plan.

Topic 6: Are there other issues or concerns related to this matter?

In response to this Topic, the DSP will respond to points made by Xcel Energy and the Department of Commerce in each of their Reply Comments filed on June 25.

Response to Xcel Reply Comments on DSP Recommendations

Distributed Solar as an Optimized Resource

In its Xcel's June 25, 2021, Reply Comments the Company appears to accept the premise that distributed resources are part of an optimized resource plan and states that it is "open to working on a modeling construct that enables identification of economic distributed solar additions as part of our next resource plan."² However, future discussions should occur in tandem with, not instead of, actions available now. There are sufficient grounds for the Commission to order modifications to the Integrated Resource Plan ("IRP") in this proceeding requiring a pilot program to test the distributed generation adoption model proposed by the DSP and to conduct benefit-cost analysis in the study to serve as a basis for a fully realized DGR model.

The Company also expressed "significant concerns" with the DSP approach of modeling only the incremental cost to the utility of incentivizes used to spur incremental uptake of distributed generation. First, the Company avers that, "present value of societal costs and revenue requirements associated with resource additions in our Resource Plan do not just represent incremental cost to incentivize, rather it is intended to represent the costs associated with the resources selected to serve our system."³ It is not clear what the Company is claiming. To the extent the Company asserts that IRP modeling should include all costs of behind the meter distributed generation as if part of the utility's revenue requirement, there is no basis for that position. In a lengthy footnote, the Company explains that the Energy Efficiency bundles proposed in the Alternate Plan were subject to a rigorous analysis of potential and to benefit-cost analysis. But that ignores the fact that those analyses are outside of the resource optimization

² *Id.* at 154.

³ *Id.* at 155.

model. The costs and benefits in a benefit-cost analysis do not become utility revenue requirements, which is what the IRP model optimizes for. Instead, the benefit-cost analysis is done in addition to the resource optimization modeling.

The DSP agree that utility programs should be subject to benefits-cost analysis. Any distributed generation incentive program developed as part of an optimized resource plan can be analyzed with a benefit-cost analysis outside the resource optimization modeling. We remain confident that such a program would pass any such test (whether Societal Cost test, participant test, or utility cost test).

As to the economic potential, the DSP included a discussion of the technical and economic potential in our Initial Comments. That analysis is necessarily not as rigorous as the technical potential analysis conducted by the Minnesota Center for Energy and the Environment in support of the Energy Efficiency bundles due to lower data availability and experience with distributed generation compared to efficiency, the analysis is nevertheless more than sufficient to justify a pilot to develop additional data, as recommended in these Supplemental Comments.

In addition, this points to the importance of integrating distribution system planning with resource planning. The most likely constraint on technical potential is distribution system hosting capacity, not available rooftops. We support incorporating distributed energy resource (“DER”) capacity analysis as part of the DER forecasting in the distribution system planning process, and members of the DSP intend to advocate for a robust assessment of DER capacity as we participate in the Company’s upcoming Integrated Distribution Plan to be filed November 1.

The second concern expressed by the Company with regard to the DGR model relates to the general argument of alleged cost shift that pervades discussion of customer-owned (as opposed to utility-owned) DERs. While the DSP disagree that distributed generation policies create a cost shift to non-participating customers, or that the net benefits exceed any such cost, the Company’s claims are irrelevant to this docket. Net metering and value of solar requirements are policy choices (like tax policy) external to this proceeding. An optimized resource mix must be determined within the context of existing law. Therefore, the only relevant cost for the DGR model in this docket is the incremental cost of an incentive designed to increase distributed generation adoption.

Finally, we disagree with the Company’s suggestion that the requirement to calculate the present value of societal costs somehow requires that participant costs or other costs be included in the cost of the Distributed Generation Resource offered to the model. The calculation of the present value of societal cost is a calculation that is performed based on modeling *outputs*—it does not impact modeling *inputs*. The costs to distributed generation customers of installing distributed generation systems do not become a revenue requirement for the utility and are, therefore, inappropriate to include in optimizing a resource plan to produce the lowest costs to the utility.

Proposed Minimum Information Requirements for Parties Submitting Alternative Plans

Section 4: E of the Company's Alternate Plan is entitled, "Lessons Learned and Recommendations for Future Resource Plans." The Company begins by expressing its appreciation for stakeholders participation in the process and recognizing that some of the proposed modifications will require ongoing effort in future proceedings. However, the Company then proposes to limit stakeholder participation in the future based on a purported concern with the volume of information requests, stakeholder involvement, and the alternative framing and content of stakeholder recommendations.

Beginning on page 152 of the Alternate Plan, Xcel proposes "some additional structure around the IRP process and party participation." The Company proposes six elements and it suggests the Commission *require* them from participating parties that conduct modeling or offer an alternative plan for the Commission's consideration.

We do not dispute that the IRP process imposes costs on the utility. Xcel has been appropriately forthcoming and helpful in response to requests for information throughout this proceeding. But that should be expected in a public process for a regulated monopoly possessing asymmetrical information. In comparison to other regulatory commission settings in which DSP group members participate, the Commission is appropriately transparent and open to participation. In fact, the Commission has taken steps to increase transparency and stakeholder participation. For example, the Commission held public hearings in winter of 2019 after the plan was first filed. In addition, the Commission has accepted public comment on the record throughout the course of the proceeding. The openness of this process to stakeholder involvement is an important feature, not a bug, and we urge the Commission to maintain and extend that accessibility, rather than take moves to restrict it.

The Company's proposed minimum requirements would limit information sharing and public participation by forcing the public to accept the utility's framing and only provide input replicating the analytical framework the Company chooses. Not only is it inappropriate to allow the Company to dictate the terms of debate, but the Company's proposal would impose an extremely high cost to the public seeking to participate. That would move in the wrong direction, away from access and transparency.

One other important note on Xcel's proposed participation requirements: parties offering information, analyses, and recommendations different from the utility's conventional approaches provide significant *value* to the Commission's evaluation of the Company's proposed plan. For example, the Consumers Plan proposed by CUB using the WIS:dom® -P model provided significant valuable context to the Commission's understanding of the costs, benefits, risks, and opportunities of different approaches. Information from different methodological approaches may be more difficult to weigh, but the benefit of enhanced understanding of resource planning from diverse perspectives outweighs any difficulties.

Response to DOC Reply Comments on DSP Recommendation

The Department of Commerce's Reply Comments addressed several points raised by the DSP in our Initial Comments. We respond to these in turn.

First, the DOC argues that utilities should not be required to consider distributed generation as a resource in IRPs.

Whether a particular resource should be a central station or distributed resource is not an IRP issue. Instead, it is an issue for the resource acquisition proceedings.⁴

As we understand the DOC's position, it is that distributed resources and utility scale resources are the same resource, that the resource plan should identify which resources, and the selection of the specific resource should be determined in a later proceeding. Thus, for example, a resource plan should select a specified amount of solar and a later acquisition proceeding should determine whether that solar should be utility scale or distributed. The premise is that distributed generation is not sufficiently different from utility-scale solar to warrant separate consideration.⁵ That is incorrect.

While the production curve of the resources may be similar, there are significant differences that warrant separate consideration. That is especially true of behind-the-meter resources or resources interconnected at the distribution level. First, as discussed in our Initial and Reply Comments, distributed generation provides multiple benefits that are relevant to a qualitative and quantitative analysis of candidate portfolios. The additional benefits of distributed generation, including those that occur because of interconnection at the distribution level, are only reflected if distributed generation is included separately in the modeling. Second, the cost of the resources to the utility is significantly different. The utility does not incur the full cost of distributed resources; those are financed primarily by the host customers. The utility incurs a cost only to the extent it provides an incentive to customers to produce an incremental uptake. As demonstrated by the Sierra Club's modeling, the relatively small incentive provided by the utility produces an increase in customer investments that increase distributed resources by significant amounts. The cost to the utility of the incentive produces more distributed generation capacity than rate basing utility scale resources because most of the costs of the distributed resources are still borne by the host customers.

The DOC's second point is that it would be inappropriate to impose a requirement that would apply to other jurisdictional utilities in a proceeding that only applies to one company. While it is likely that other utilities would also benefit from including distributed generation as a resource for future planning, we are not asking that the Commission mandate that in this proceeding. Other utilities' resource planning can be assessed in those utilities' planning proceedings.

⁴ DOC Reply Comments at 12.

⁵ The DOC does recommend that Xcel be required to consider distributed generation in future resource acquisition proceedings.

Third, the DOC appears to argue for including the customers' costs of DGRs in a Societal Benefit-Cost test as part of resource selection in an IRP. As discussed above, responding to similar claims by Xcel, the societal benefits of distributed generation exceed its costs. However, that does not mean that non-utility costs can or should be included in a resource optimization model solving for the lowest revenue requirement for the utility. In short, costs to host customers do not become revenue requirements like the cost to rate base utility owned generation and cannot be considered utility costs in optimizing a resource portfolio based on lowest utility revenue requirements.

Fourth, the DOC argues that the conventional approach of forcing distributed generation into the capacity expansion model is appropriate because the company does not have control over the amount of distributed solar that individual customers install. That is simply not true, as the DSP's price response adoption model provided in this docket demonstrates. Because the record establishes a clear, quantifiable, relationship between cost and uptake, lowering the cost borne by the host customer produces a quantifiable increase in distributed resource uptake. Lowering the cost borne by the host customer is within the utility's control in the same way that lowering the cost of energy efficiency to the host customer is within the utility's control: proving incentives. Recognizing that distributed solar is relatively new, compared to efficiency programs, and therefore the data for uptake at different incentive levels is relatively recent, we recommend a pilot program at this time to determine the effectiveness of incentives to produce distributed generation uptake by customers, which produces benefits to the utility and all customers.

Conclusions and Recommendations

In conclusion, the DSP once again thank the Commission for the opportunity to provide these supplemental comments. We also applaud Xcel Energy for abandoning the Sherco CC in the Company's Alternate Plan. The DSP's remaining concerns, especially those around the proposed CTs, can be addressed in the separate proceedings the Company envisions for the CTs.

The DSP continue to believe that the Company should be required to include the DGRs proposed by the DSP and modeled by Sierra Club in Company's approved plan. We recommend that the Commission direct the Company to initiate a pilot program to test the distributed generation adoption model as proposed it in our initial comments.

The DSP also recommended that the Commission not adopt the proposed minimum requirements for participating parties offering alternative plans suggested by Xcel Energy.

Dated: October 15, 2021.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of October 2021, I have served the foregoing on the attached lists of persons by depositing a true and correct copy by electronic filing.

Dated: October 15, 2021.

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Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_19-368_19-368_Official
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