

**STATE OF MINNESOTA
PUBLIC UTILITIES COMMISSION**

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April 11, 2022

In the Matter of Xcel Energy’s 2021 Integrated Distribution System Plan and Request for Certification of Distributed Intelligence and the Resilient Minneapolis Project

Docket No. E002/M-21-694

RESPONSE COMMENTS OF FRESH ENERGY

Fresh Energy submits these *Response Comments* in response to the Commission’s March 14, 2022, *Notice of Extended Comment Period* regarding Northern States Power Company dba Xcel Energy’s (“Xcel” or “the Company”) 2021 Integrated Distribution Plan (“IDP”) and Requests for Certification. Below, we address the Department’s proposed Guidance Document, respond to Xcel’s *Reply Comments*, and address important issues raised by Community Power, Environmental Law and Policy Center, and Vote Solar (“CEV”) and the City of Minneapolis.

I. Response to Xcel

Fresh Energy appreciates the Company’s responses to the questions we posted in Initial Comments. Our recommendations for improvements to the IDP process focused on: (1) improving load and distributed energy resources (“DER”) forecasting, (2) better integration of DER forecasts into planning processes, and (3) accelerating the adoption of advanced inverter functionality. We are glad to hear that Xcel is moving forward on each of these objectives and in most cases is open to our recommendations or already planning to incorporate improvements into its 2023 IDP. We address each specific issue briefly below.

1. Using LoadSEER to Improve Load and DER Forecasting

Xcel notes that LoadSEER is a new tool for the Company and industry, and that use of its forecasting capabilities for planning should be an iterative process.¹ Fresh Energy

¹ Xcel Reply, Attachment A p. 27 of 42

wholeheartedly agrees. We see the need for iteration, learning, and refinements over time as strengthening the case for bringing LoadSEER results into the IDP in 2023. Beginning to publish forecasting results and discussing the trade-offs or challenges posed by using these results in risk analysis and planning will be very valuable for stakeholders and the Commission.

Fresh Energy recommends that, as it continues to implement LoadSEER, Xcel prioritize the incorporation of “net load,” demand-side management, and beneficial electrification impacts as further described below.

a. Native vs. Net Load

Fresh Energy is pleased to read that Xcel is “working toward being able to create a net load forecast in addition to the native load forecast we currently use for each of our feeders and banks within LoadSEER” and is planning to “include the results of this broader analysis in our 2023 IDP.”² Xcel also notes it is “working toward determining the methodology for appropriately using net load forecast information in our planning process and risk analysis.”³ These two elements: a granular net load forecast that can be used in LoadSEER, and a methodology for applying net load to risk analysis and planning, will be directly responsive to our recommendation.

We request the Commission adopt our original recommendation to ensure this foundational issue receives sufficient attention in the preparation and filing of the 2023 IDP.

Fresh Energy recommends that Xcel prioritize the use of “net load” in its load forecasts and system planning for the November 1, 2023 IDP and include in the filing a detailed explanation of Xcel’s proposed methodology for incorporating the load-reducing impact of distributed generation into its load forecasts and system planning processes.

b. Demand-Side Management (“DSM”)

Xcel clarified that anticipated energy efficiency is already included in load forecasting and so, at this time, additional DSM forecasting would focus on the impacts of demand response (“DR”).⁴ Xcel discussed some of the challenges with this, including how to value temporary or uncertain load reductions from DR and how to incorporate potential load reductions into planning given that current DR programs target system-wide peaks not distribution-level needs. Fresh Energy appreciates the Company’s explanation and recognizes the potential complexity of incorporating DR into distribution level forecasting. We are glad to hear that Xcel is integrating customer

² Xcel Reply, Attachment A p. 27 of 42

³ Id.

⁴ Xcel Reply, Attachment A p. 28 of 42

demand response program enrollment data with LoadSEER and we look forward to future discussions of how to account for this load reduction in distribution forecasts and planning.

While today's DR programs target system-wide peaks, it is appropriate for Xcel to begin designing DR programs that can be called on to meet local distribution system needs. Load forecasting that takes existing DR capacity into consideration will be valuable for informing the development of such localized DR programs. Given the ever-increasing importance of load flexibility and the growing volume of DR on Xcel's system, it is critical that we begin to incorporate its load-modifying impacts into load forecasts and discuss the challenges of doing so in the IDP.

Fresh Energy recommends that Xcel make it a priority to integrate its systems and processes to be able to incorporate the load-modifying impacts of DSM in its feeder and substation load forecasts. Xcel should propose a methodology for valuing the load-modifying impacts of demand response into load forecasts in the 2023 IDP and present a load forecast that includes DSM contributions.

c. Electrification of Transportation, Buildings, and Industry

As Xcel notes, the Commission's recent decision on Xcel's integrated resource plan includes decision points that closely align with our electrification forecasting recommendations. We look forward to participating in any stakeholder discussions focused on these objectives.

Fresh Energy recommends Xcel hold at least two stakeholder workgroup meetings by December 1, 2022 to identify appropriate transportation, building, and industrial end-use electrification scenarios for inclusion in the 2023 IDP load forecast.

2. Distribution Planning for DER Integration

a. Preparing for Proactive Upgrades

As Xcel notes, the Commission's recent decision on Xcel's IRP included the following language:

E3.c. Proactively plan investments in hosting capacity and other necessary system capacity to allow distributed generation and EV additions consistent with the DER forecast.⁵

This direction from the Commission requires that Xcel begin to plan for and propose distribution investments that are responsive to anticipated distributed generation and

⁵ Xcel Reply Comments, Attachment A, p. 22 of 42. (PUC Order forthcoming)

electrification additions. As noted in our Initial Comments, currently, the cost of any grid upgrade precipitated by a distributed generation or storage project is assigned to that project. Recently, Xcel began performing some group interconnection studies where multiple distributed generation projects may share these costs – but interconnection applicants bear the full cost. This approach is not practical for proactive upgrades, where a specific interconnection applicant (or group of applicants) is not known.

Fresh Energy believes it would be prudent for stakeholders to begin discussion of how to address these cost allocation issues. Given the Commission’s recent direction and the pressing interconnection challenges on Xcel’s system, we are modifying our recommendation slightly to encourage beginning this process before the next IDP is filed.

Fresh Energy recommends that Xcel hold at least two stakeholder workgroup meetings by December 1, 2022 to discuss:

- ***How Xcel anticipates proactively planning for grid investments to allow distributed generation and EV additions consistent with the DER forecast.***
- ***Potential cost allocation methods for proactive upgrades, including a review of approaches used in other jurisdictions.***
- ***Current rules, tariffs, and practices governing cost allocation of distribution (and, where relevant, transmission) upgrades for distributed generation and electric vehicles integration in Xcel’s Minnesota service territory.***

b. Synergies between Interconnection-Driven and Planned Distribution Investments

In response to our questions on whether there is coordination between interconnection-driven and other/routine distribution upgrades, Xcel notes that interconnection facilities studies take into account grid upgrades planned within the next two years. We are pleased to hear there is coordination between these functions. Given the scale of investments Xcel is proposing in this upcoming planning period, we recommend that Xcel estimate the potential synergies or efficiencies these projects are expected to provide for DER integration as part of the next IDP.

Fresh Energy recommends that Xcel estimate the potential synergies between interconnection upgrades and planned distribution capital investments, and discuss the anticipated overlap between planned investments and capacity constrained locations on Xcel’s distribution system, in its November 1, 2023 IDP.

3. Advanced Inverters and IEEE 1547-2018 Standard

In response to Fresh Energy’s recommendations for accelerating adoption of advanced inverter functions under the IEEE Standard 1547-2018, and particularly the default settings for volt-var with reactive power priority, Xcel notes that it is working with consultants at ICF on this topic and waiting for additional information that may emerge from research EPRI is conducting on inverter settings. Xcel also notes that it expects to be able to share its roadmap in Q3 of this year, but that the timeline for “tested and certified inverters [to be] readily available...has been delayed into 2023.”⁶ We continue to recommend that, in its implementation of IEEE Std 1547-2018, Xcel adopt default inverter settings for volt-var with reactive power priority. We recognize that this will likely be a question for a future regulatory proceeding once Xcel publishes its smart inverter roadmap and/or proposed requirements for IEEE Std 1547-2018 certified equipment. As such, we recommend that Xcel file its roadmap and supporting documentation as soon as practical, and at latest by October 1, 2022.

Fresh Energy recommends that Xcel file its smart inverter roadmap and related consultant reports in this docket by October 1, 2022.

4. Distributed Intelligence (DI) Certification Request

Fresh Energy appreciates the Company’s response to the concerns raised in our *Initial Comments* about the proposed grid-facing use cases and questions around data access by third parties. We continue to recommend certification of the customer-facing use cases Home Area Network (“HAN”) and Energy Analysis. We believe Xcel has demonstrated that these are beneficial investments that will provide customers with useful information on their energy usage and enable customer programs with significant energy conservation potential. It is important to note that Xcel’s proposed Energy Analysis use case can detect and provide analytics on electric vehicles in addition to electric equipment and appliances.⁷ For this reason, Fresh Energy is not recommending certification of the Electric Vehicle-specific use case.

We continue to recommend against certification of the three grid-facing use cases. We appreciate that there may be value to the information, capabilities, and internal experience these applications could provide, but Xcel has not yet demonstrated that they are “necessary to modernize the transmission and distribution system” by enhancing reliability or by meeting one of other grid modernization criteria required by statute.⁸ The Commission has used this “necessary to modernize...” threshold to determine whether certification is appropriate in several past grid modernization proceedings.⁹

⁶ Xcel Reply Comments, Attachment A, p. 25 of 42

⁷ Xcel Energy response to Fresh Energy IR No. 50(c).

⁸ <https://www.revisor.mn.gov/statutes/cite/216B.2425>

⁹ See: *Order Approving Pilot Program, Setting Reporting Requirements, and Denying Certification Request*, August 7, 2018, Docket Nos. E-002/M-17-775 & E-002/M-17-776, p. 7; and *Order Accepting Integrated*

While there is abundant theoretical value in collecting comprehensive “grid edge” information, the question of *need* asks us to consider if and how the information will be used, what impact its usage will have for customers, and whether those benefits are worth the cost. At this time, the Company’s explanation of the grid-facing use cases has not satisfactorily answered these questions.

Additionally, Fresh Energy understands that AMI data with appropriate analytic software can provide the same or very similar information as each of the proposed grid-facing DI applications. Xcel has not yet evaluated the trade-offs in cost and useability between DI-delivered information versus AMI data with analytics. A comparison between these alternatives, and the customer benefits each would enable, will be necessary before the Commission can determine that DI is the appropriate way to collect this information.

5. Conditions for DI Certification

Fresh Energy continues to also recommend that the Commission set cost caps for the initial certification of the HAN and Energy Analysis use cases, as it did when certifying the Advanced Planning Tool in 2020.¹⁰ Limiting certification up to the proposed budget amounts, and requiring “clear and convincing evidence” for any additional cost recovery is appropriate given how new this technology is and the uncertainty of DI development and implementation costs.

Fresh Energy recommends that the Commission certify the Energy Analysis and HAN Connectivity Distributed Intelligence use cases and limit cost recovery to a cost cap of \$9.5 million in capital expenditure and \$12.2 million in O&M unless Xcel can show, by clear and convincing evidence, that additional costs were reasonable, prudent, and beyond its control.

Fresh Energy continues to recommend that the Commission establish performance metrics for the Energy Analysis use case and require Xcel to track and report on customer participation and energy savings per participant. We recommend adoption of targets consistent with the assumptions in Xcel’s DI cost-benefit analysis (i.e., 9.75% of customers with an AMI meter will enroll in the energy analysis program and save 5% of their annual energy consumption¹¹).

If the Commission prefers not to adopt performance targets as a condition of certification, we strongly recommend it do so if and when granting cost recovery. To advance that aim in this

Distribution Plan, Modifying Reporting Requirements, And Certifying Certain Grid Modernization Projects, July 23, 2020, Docket No. E-002/M-19-666, p. 15

¹⁰ *Order Accepting Integrated Distribution Plan, Modifying Reporting Requirements, And Certifying Certain Grid Modernization Projects*, July 23, 2020, Docket No. E-002/M-19-666, p. 17

¹¹ IDP, Appendix G, p. 36

proceeding, the Commission could require that Xcel address performance targets, including a 9.75% enrollment rate (of customers with an AMI meter) and a 5% annual energy savings rate from the energy analysis program, in any future cost recovery request for DI.

6. Resilient Minneapolis Project Certification Request

We appreciate Xcel's responses to our initial comments, including the Company's answers to the questions we posed and openness to our suggested changes to the RMP. We continue to recommend certification of RMP and provide brief responses to Xcel's reply comments below.

a. Local Union Labor

We appreciate that Xcel will consider contracting with companies that use local union labor when selecting BESS and microgrid vendors for the RMP sites. We agree with the Company's note that this preference would need to be considered alongside prioritizing supplier diversity criteria, specifically women- and minority-owned businesses, within the procurement process.

b. Annual Reporting Requirements

Fresh Energy appreciates that Xcel is open to including our suggested additions to future RMP annual reports. We understand that any reporting on HVAC upgrades, building envelope improvements, etc. will be subject to the consent from the individual RMP site hosts. We continue to recommend the three additions to annual reporting noted in our Initial Comments.

c. Applying BESS and Microgrid Project Lessons to RMP

Xcel noted several topics where current programs in Wisconsin and Colorado have yielded learnings that may inform the RMP process, including design and construction, fire safety precautions, permitting complexities, and vendor limitations. We understand that some of these programs are in design and construction and do not yet have operational learnings. We continue to recommend that in annual RMP reports, Xcel highlight and provide specific details on lessons from other programs/projects which have informed RMP decisions, reduced costs, or improved project efficiency.

Regarding lessons learned on procurement, Xcel also notes that there is a "need for realistic timelines due to supply chain issues and long lead times for BESS. Many BESS vendors are moving toward large utility-scale projects only." More broadly, supply chain issues are causing delays and cost increases across the global economy and in Minnesota. This context, and the movement of BESS vendors towards larger utility-scale projects, raise concerns about the procurement and construction processes. We urge Xcel to keep the procurement process as open and competitive as possible, given the constraints of this project, to balance against the potential for a lower number of

bids and supply chain issues to elevate costs. Fresh Energy recommends that Xcel include in its annual RMP reports any changes to the original proposed timeline for the project and describe the impact of any supply chain or market-related issues it encounters. We also recommend that Xcel file a letter in this docket to notify the Commission and stakeholders if the Company encounters any significant procurement challenges, including delays, low bid numbers, or unexpected costs.

d. Applying RMP lessons to future Minnesota projects

As discussed in our *Initial Comments*, Fresh Energy views the opportunities RMP presents for gaining experience with batteries, microgrid controls, and integration with the distribution system to be one of the most important benefits of this pilot. In addition to applying lessons from similar projects in Colorado, Wisconsin and elsewhere to RMP, we hope to see Xcel apply learnings from RMP to future projects or programs in Minnesota. For example, we expect to see Xcel apply lessons from RMP to future microgrid and BESS projects, the recently proposed resilience as a service program,¹² potential non-wires alternatives, and partnerships with cities, community centers, and workforce development providers more broadly. In order to maximize these benefits, Xcel should ensure that internal teams are sharing information about these various initiatives as well as sharing lessons from the pilots with regulators, local governments, and others invested in resilience and grid modernization via reporting in this docket.

Fresh Energy anticipates that other communities and institutions in Minnesota may be interested in replicating aspects of the RMP in their own area. We strongly support the RMP, but we believe that ratepayer funding alone may not be the appropriate avenue for replicating similar projects, unless doing so will have broad system-wide benefits. Thus, we strongly encourage Xcel to seek opportunities – and support interested customers in seeking opportunities – for external funding and/or third-party financing partners for resilience investments. We understand that Xcel is already exploring whether federal funding resulting from the 2021 Infrastructure Investment and Jobs Act could be used to support communities interested in similar resilience projects in coming years.¹³

II. Response to the Department of Commerce

Fresh Energy appreciates the Department's work to develop a guidance document to consolidate and distill filing requirements for grid modernization investment proposals,

¹² Xcel, Petition, April 7, 2022, Docket No. E002/M-22-170

¹³ Conversation with Xcel staff, April 8, 2022

establish best practices for evaluating proposed investments, and improve clarity on the relationship between IDPs and cost recovery proceedings. Given that this is a new document and stakeholders have not yet had a chance to weigh in, it would not be appropriate for the Commission to rely on it in this proceeding. Fresh Energy does not object to the Department using the guidance document to support their own positions, in particular areas of the document that consolidate prior Commission direction or provide relevant best practices. However, we caution against making decisions in this proceeding that tacitly approve new standards of review. We encourage consideration of the guidance document on a forward-looking basis. It may be useful to get stakeholder input on the guidance document's contents and how it should be used by the Commission in future IDPs and grid modernization cost recovery proceedings.

Several stakeholders including the Department and CEV noted that it would be useful to have one document consolidating all the IDP filing requirements, and in Reply Comments Xcel seconded this proposal.¹⁴ Fresh Energy agrees this would be quite valuable – both for Xcel and stakeholders.

III. Response to Equity Recommendations:

Fresh Energy appreciates the comments from CEV and the City of Minneapolis around the importance of better integrating equity into future distribution planning efforts. We agree that equity considerations should play a larger role in guiding the development of and proposals within future IDPs. We commend Xcel for demonstrating interest and commitment to this objective already with development of the RMP projects.

The equity decisions recently adopted by the Commission in Xcel's IRP proceeding include direction that goes beyond resource planning-specific topics to procedural justice, environmental justice, and equity improvements in distributed generation and energy efficiency programs. We believe replicating the decision option in this IDP proceeding could help ensure that distribution planning stakeholders and topics are included in the stakeholder work contemplated by this decision option. Fresh Energy notes, however, that the IRP decision option does not include any direction related to equity of distribution system or grid modernization investments. We offer that the Commission could add a subpart (g) to the decision option to this effect. This would preserve the existing recommendations and reduce confusion and ensure there is not duplicative effort, while adding distribution planning to the list of topics the forthcoming equity docket will address. It may also be valuable to ask Xcel to cross-file progress reports in relevant IDP dockets, in addition to the next IRP proceeding. Fresh Energy proposes subpart g below:

¹⁴ Xcel Reply Comments, Attachment A, p. 34 of 42

The Company shall do community outreach and establish a stakeholder group to:

...

(g) Ensure the Company's distribution investments, grid modernization investments, and program offerings that make use of grid modernization investments prioritize equity and access, particularly for low-income households and Black, indigenous, and communities of color.

IV. RECOMMENDATIONS

Fresh Energy's final recommendations¹⁵ for the Commission as of these reply comments are summarized below.

Xcel's Next-Filed Integrated Distribution Plan and Stakeholder Engagement

1. The Commission should direct Xcel to prioritize the use of "net load" in its load forecasts and system planning for the November 1, 2023 IDP and include in the filing a detailed explanation of Xcel's proposed methodology for incorporating the load-reducing impact of distributed generation into its load forecasts and system planning processes.
2. The Commission should direct Xcel to integrate its systems and processes to be able to incorporate the load-modifying impacts of DSM in its system-wide, feeder and substation load forecasts in its November 1, 2023 IDP. As part of the 2023 IDP, Xcel should propose a methodology for valuing the load-modifying impacts of demand response in load forecasts and present a load forecast that includes demand response contributions.
3. The Commission should direct Xcel to hold at least two stakeholder workgroup meetings by December 1, 2022 to identify appropriate transportation, building, and industrial end-use electrification scenarios for inclusion in the 2023 IDP load forecast.
4. The Commission should direct Xcel to hold at least two stakeholder workgroup meetings by December 1, 2022 to discuss:
 - How Xcel anticipates proactively planning for grid investments to allow distributed generation and EV additions consistent with the DER forecast.
 - Potential cost allocation methods for proactive upgrades, including a review of approaches used in other jurisdictions.

¹⁵ These replace recommendations from *Initial Comments*.

- Current rules, tariffs, and practices governing cost allocation of distribution (and, where relevant, transmission) upgrades for distributed generation and electric vehicles integration in Xcel's Minnesota service territory.
5. The Commission should direct Xcel to estimate the potential synergies between interconnection upgrades and planned distribution capital investments, and discuss the anticipated overlap between planned investments and capacity constrained locations on Xcel's distribution system, in its November 1, 2023 IDP.
 6. The Commission should direct Xcel to file its smart inverter roadmap and related consultant reports in this docket by October 1, 2022.
 7. The Company shall do community outreach and establish a stakeholder group to:
 - a. Design for the equitable delivery of electricity services and programs for energy burdened customers in the next IRP.
 - b. Create new options to improve customer access to energy efficiency and renewable energy.
 - c. A plan to be submitted in the next IRP to bring its workforce's racial and gender diversity in line with the utility's stated goals.
 - d. Design DG Resource incentive programs that ensure distributed generation programs provide equitable access to low income and Black, indigenous, and communities of color that have disproportionately borne costs of unjust and inequitable energy decisions.
 - e. Adopt practices in furtherance of procedural justice, including deeper engagement with renters, affordable rental property owners, BIPOC communities, and under resourced individuals, providing resources for engagement and participation, and providing financial support for impacted individuals to participate in dockets and decision-making processes.
 - f. Form an environmental justice accountability board, which would develop environmental justice-focused initiatives to be incorporated throughout the utility.
 - g. Ensure the Company's distribution investments, grid modernization investments, and program offerings that make use of grid modernization investments prioritize equity and access, particularly for low-income households and Black, indigenous, and communities of color.

In its next IRP docket, its most recent IDP docket, and in a separate docket to be established by the Executive Secretary, Xcel shall file details describing stakeholder outreach and progress by January 1, 2023 and annually thereafter.

Xcel's Distributed Intelligence Certification Request

1. Fresh Energy recommends that the Commission approve certification of two of the initial use cases in Xcel's Distributed Intelligence (DI) request, and deny certification of the other four use cases at this time:
 - a. Home Area Network (HAN) Connectivity - *Approve*
 - b. Energy Analysis - *Approve*
 - c. Electric Vehicle Detection – *Included with the Energy Analysis use case*
 - d. Secondary Equipment Assurance – *Deny*
 - e. Meter Bypass Theft Detection – *Deny*
 - f. Connectivity – *Deny*

2. Cost recovery of the Energy Analysis and HAN Connectivity Distributed Intelligence use cases is limited to a cost cap of \$9.5 million in capital expenditure and \$12.2 million in O&M unless Xcel can show by clear and convincing evidence that additional costs were reasonable, prudent, and beyond its control. This does not imply any finding of prudence with respect to the recovery of costs in a petition for rider recovery under Minn. Stat. § 216B.16, subd. 7b(b), or certification or approval of any investments beyond those specifically associated with the Energy Analysis and HAN Connectivity Distributed Intelligence use cases.

3. (Preferred) The Commission establishes performance metrics for the Energy Analysis use case to track customer participation and energy savings per participant. Initial targets, consistent with the assumptions in Xcel's DI cost-benefit analysis, are:
 - a. 9.75% of customers with an AMI meter will enroll in the energy analysis program, and
 - b. Customers enrolled in the energy analysis program save, on average, 5% of their annual energy consumption.Xcel shall report on performance relative to these targets in all compliance filings and annual reports related to DI deployment.

3. (Alternate) The Commission directs Xcel to address performance targets in any future request for cost recovery of the Energy Analysis DI use case, including at minimum the feasibility and proposed implementation of:
 - A 9.75% enrollment rate target (of customers with an AMI meter), and
 - A 5% annual energy savings rate target

Xcel's Resilient Minneapolis Project Certification Request

1. Fresh Energy recommends the Commission approve certification of the Resilient Minneapolis Project.

2. The Commission should direct Xcel to include three additional categories of information in annual reports on the Resilient Minneapolis Projects:
 - a. Optional feedback from site hosts and community partners, using a form Xcel distributes on an annual (or more frequent) basis, which invites partners to discuss their experience participating in the project, its impact on the organization or community, or other information partners wish to share with the Commission.
 - b. Updates on the status of HVAC upgrades, building envelope upgrades, energy efficiency measures, and/or demand response programs undertaken at any of the RMP sites, shared at the discretion of RMP site hosts and partners.
 - c. A discussion of the RMP program in comparison to battery and microgrid programs/projects in Xcel's other service territories, lessons learned from these programs, and specific details how these lessons are informing RMP project decisions, reducing costs, and/or improving efficacy.
3. The Commission should direct Xcel to include in annual RMP reports any changes to project timeline and describe the impact of any supply chain or market-related issues it encounters.
4. Xcel should file a letter in this docket to notify the Commission and stakeholders if the Company encounters any significant procurement challenges related to RMP, including delays, low bid numbers, or unexpected costs.

Fresh Energy appreciates the opportunity to comment on the important investment decisions and policy matters under consideration here. Thank you for the Commission's time and consideration of our comments.

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