

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Joseph K. Sullivan	Vice Chair
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
John A. Tuma	Commissioner

In the Matter of Xcel Energy’s 2021 Integrated)	
Distribution System Plan and Request for)	PUC Docket No. E002/M-21-694
Certification of Distributed Intelligence and)	
the Resilient Minneapolis Project)	

April 11, 2022

**REPLY COMMENTS OF COMMUNITY POWER, ENVIRONMENTAL
LAW & POLICY CENTER, AND VOTE SOLAR**

I. INTRODUCTION

Community Power, the Environmental Law & Policy Center, and Vote Solar (collectively referred to hereafter as “CEV”) respectfully submit these Reply Comments regarding Xcel Energy’s 2021 Integrated Distribution Plan (“IDP”) in response to the Minnesota Public Utilities Commission’s November 15, 2021 Notice of Comment Period in Docket No. E-002/M-21-694, In the Matter of Xcel Energy’s 2021 Integrated Distribution System Plan and Request for Certification of Distributed Intelligence and the Resilient Minneapolis Project.

These comments provide CEV’s responses to the Reply Comments filed by Xcel on March 22, 2022,¹ the Initial Comments filed by other parties on February 25, 2022, the report prepared by Synapse Energy Economics in support of the Initial Comments of the Minnesota Department of

¹ Reply Comments of Xcel Energy, *Xcel Energy’s 2021 Integrated Distribution Plan and Request for Certification of Distributed Intelligence and the Resilient Minneapolis Project* Docket No. E002/M-21-694, March 22, 2022. (Xcel Reply Comments)

Commerce (“DOC”),² and the early Reply Comments submitted by Renewable Energy Partners (REP) on April 1, 2022 in support of Xcel’s Resilient Minneapolis project.³

CEV continues to support the Commission’s acceptance of Xcel’s 2021 IDP contingent upon our two original recommendations to amend the IDP planning objectives and filing requirements in order to:

- improve the consideration of DERs as a grid resource; and
- directly integrate considerations of equity as a core objective of the utility planning process.

The Commission has taken important steps in recent months and years to explicitly include equity as a consideration in its decision-making and utility planning processes. CEV’s recommendations will help align these critical equity objectives across all planning and cost recovery dockets as a lens for evaluation of a just and reasonable energy system. This is especially important to ensure procedural access to all communities who wish to have their voices heard and acted upon before the Commission, but have few resources to do so.

II. REPLIES TO PARTY COMMENTS

A. Incorporating Equity into Decision Making

CEV’s Initial Comments recommended specific changes to the Commission’s planning objectives and filing requirements for IDP cases to directly incorporate equity considerations into the processes that the Company uses to prioritize spending and investment.

In response, Xcel states that it “fully support[s] incorporating equity broadly into energy planning and decision-making.”⁴ CEV appreciates the Company’s clear and direct support for this important principle. At the same time, the Company universally opposes stakeholders’ recommendations to amend the IDP planning objectives to incorporate equity directly, and suggests that a separate docket created by the Commission’s IRP Order will be sufficient. The

² Comments of the Minnesota Department of Commerce, Division of Energy Resources, Xcel Energy’s 2021 Integrated Distribution Plan and Request for Certification of Distributed Intelligence and the Resilient Minneapolis Project Docket No. E002/M-21-694, February 25, 2022. Comments included Synapse Energy Economics Inc., Comments on the Grid Modernization Proposals in Xcel’s 2021 IDP Analysis of the Proposals for Distributed Intelligence and the Resilient Minneapolis Program and Recommendations on Certification, Prepared for the Minnesota Department of Commerce, February 25, 2022.

³ Comments of Renewable Energy Partners, *Xcel Energy’s 2021 Integrated Distribution Plan and Request for Certification of Distributed Intelligence and the Resilient Minneapolis Project*, Docket No. E002/M-21-694, April 1, 2022.

⁴ Xcel Reply Comments, pg. 11.

Company describes its position as “centralizing” the discussion in order to avoid “duplication” of effort.

However, Xcel's proposal to “centralize” the discussion of equity in a separate docket – a docket that was only recently required of the Company after significant effort sustained over many years – will primarily serve to silo, delay, and disjoint the conversation, not amplify nor embed it in the Commission’s day-to-day work.

Community members and advocates should not be asked to choose between engaging in a separate equity docket and engaging effectively in the other dockets that shape affordability, reliability, and resilience (i.e. IRPs, IDPs, and Rate Cases). Those dockets will not stop coming simply because another has been added, and the practical reality is that only the Company and perhaps the Department of Commerce have the institutional resources to effectively engage in every regulatory proceeding at the Commission.

The Company cites the Commission’s Decision Option creating the new equity docket as a reason *not* to embed equity as one of the core objectives of the IDP process:

We see opportunity in the adopted Decision Option referenced above that anticipates a separate equity docket with annual reporting requirements. We anticipate that this new docket will provide a more holistic but central process and forum to engage stakeholders and attempt to reach consensus on how equity can be incorporated across the Company, including in our IRP, IDP, and related dockets. As such, we do not believe CEV’s or the City of Minneapolis’ proposed additions to the IDP planning objectives and filing requirements are necessary at this time.⁵

CEV and many other stakeholders – including the Company by its own self-description – share the overall vision of broadly incorporating equity into all energy planning and decision-making processes. However, we and other stakeholders arrive at a very different conclusion from the Company with respect to the path to achieving this goal.

Equity is a lens through which to continually apply context; it’s not a topic that can be addressed in isolation. The critical lens for evaluation of costs and benefits cannot and should never be limited to one docket if we wish to have a cost-effective grid. Stakeholders should be welcome to question, discuss, and suggest metrics and directives about the cost-effectiveness of Xcel's decisions in whichever dockets those concerns arise. Equity is the same – it is a critically important lens through which we must evaluate Xcel's decisions in order for the system and all its pieces (generation, transmission, distribution, rates, locational reliability, etc.) to be equitable - or to be just and reasonable for all Minnesotans.

⁵ Xcel Reply Comments, pg. 11.

Siloing slows and undermines engagement from those most marginalized from decision-making tables. Siloing is listed in the growing mainstream body of writing on equity as one of the common "traps and tropes" that undermine meaningful outcomes. It is defined in one article on educational equity as: "Locating equity work in a separate and siloed policy, team, or body."⁶ By divorcing the context of a specific docket from the lens of equity, decisions become too broad and lack meaning. Equitable access to something, for example, may be unwanted if the specific proposed infrastructure is unwanted by certain communities. From even a procedural equity standpoint alone, this pushing off of equity into a separate place is counter to the goal. Communities face both (for lack of better terms) a "whack-a-mole" situation, in which they must choose where they can engage from all the issues that affect them splintered off into dozens of dockets, and a "hide-the-ball" situation, in which the most important issues (reliability, equity, access affordability, safety, resilience) are only deemed germane in certain dockets. The Company and the Commission should take great care to listen to and incorporate those concerns whenever and however they are surfaced because the stakeholders who may be most affected by these issues may not have the technical nor economic resources to raise them in the "appropriate" forum. There is a resource differential that is particularly unsettling when put in context of the Company's influence at the Commission and the Capitol. The Company is the sole stakeholder beyond the Commission and perhaps the Department that can engage in every conversation.

Creating more opportunities to discuss equity, not fewer, is essential for long-term engagement. While we are very excited by the new equity directives put forward by stakeholders and adopted by the Commission in Xcel's recent IRP, there is a long learning curve ahead. Stakeholder sessions to date that have been led by the Company still largely consist of a small number of advocates with long histories of engaging in the Commission's regulatory process. The agendas, time, location, and topics of discussion are largely set by the Company, and, speaking only for Community Power, we have witnessed those efforts as largely inaccessible to community organizations. CEV hosted two discussion groups with four Twin Cities stakeholders on Xcel's IDP, which highlighted significant interest and some frustration at the language used. One stakeholder remarked:⁷

"Broader and more intentional marketing campaign by Xcel [about these grid projects]. Bring down the jargon. If the community doesn't know what you are talking about, you are not doing your job. Past programs, marketing materials are too complex."

Others talked about more transparency, clarity, and community input:

⁶ "Beware of Equity Traps and Tropes," Jamila Dugan, Association for Supervision and Curriculum Development, <https://www.ascd.org/el/articles/beware-of-equity-traps-and-tropes>

⁷ Focus groups included four residents of the Twin Cities (St. Paul, northside Minneapolis, southside Minneapolis). 100% of participants were women, 50% BIPOC, 25% renters. All had knowledge of the PUC and energy proceedings, but none claimed familiarity with the IDP.

"More transparency into how old things are/when they need to be updated, make sure communities are getting what they deserve"

"Public version of reliability map"

"Interesting about the requirements to support local renewables and can we actually hold them to that?"

"What does affordability mean to Xcel when it comes to accessing the grid?"

This tension of embedding key impacted communities in decision making is described well by a study completed on New York's efforts to include environmental justice communities into energy and climate planning:

"As a practical matter, however, the successful integration of environmental-justice issues in energy related proceedings cannot depend on the heroic efforts of a few passionate and involved individuals. Rather, policymakers must provide a framework that evinces a staunch commitment to environmental-justice issues. [...]Almost by their very definition, environmental-justice groups lack the financial and technical resources to participate effectively in many stakeholder processes. [...]"

"There is a significant difference between simply “inviting” community-based and environmental-justice organizations to participate in a process and actually engaging these groups effectively. In the words of one interviewee, an invitation is nothing more than a seat “at the table” to participate in someone else’s process, whereas “engagement” represents an opportunity to shape the process itself. In the former situation, the environmental-justice stakeholder is limited to a menu of options on which to weigh in, and his or her participation is perceived as something to be “tolerated. In the case of the latter, the environmental-justice stakeholder has a role in developing the menu."

"[...E]ngagement of environmental-justice stakeholders, rather than simply inviting such organizations to be part of the process, requires state agencies to make a significant commitment to integration of these inerests [sic]. As noted above, environmental-justice stakeholders generally lack the resources to devote the time and effort necessary for informed participation in energy[...] planning processes. [...]he inadequacy of the technical resources available to environmental-justice organizations must be redressed by state agencies increasing the commitment of resources, including personnel dedicated to

ensuring stakeholder participation and maintaining such participation throughout the process."⁸

If the Company believes as they say they do, and as we do, that it is an essential feature of the grid to serve Minnesotans equitably, then equity must be integrated into all of the Company's plans, not siloed in a separate docket.

In summary, CEV maintains that equity is a fundamental lens for evaluating the energy system that requires attention and evaluation in every single proceeding. It is not a topic that can be siloed - it is not relevant in one place and off-topic in another. It is concerning from a public process perspective to bottleneck or concentrate the discussion of equity to a singular docket. Finally, cross-cutting consideration of equity across dockets (IRP, IDP, Rate Case, Service Quality, etc.) will help foster integration, not duplication.

B. DOC Guidance Document and BCA Framework

On February 9, 2022, the Department of Commerce filed Comments in Docket No. E002/M-21-814 *In the Matter of Northern States Power Company d/b/a Xcel Energy's Petition for Approval of the Transmission Cost Recovery Rider Revenue Requirements for 2021 and 2022, Tracker True-up, and Revised Adjustment Factors* (2021-2022 TCR Docket) in which it provided a report prepared by Synapse Energy Economics. The report, *Review and Assessment of Grid Modernization Plans: Guidance for Regulators, Utilities, and Other Stakeholders* ("Guidance Document"), proposes a framework for evaluating utility investment in grid modernization infrastructure.

According to the February 8, 2022, DOC Letter, the purpose of the Guidance Document is three-fold:

[F]irst, it is intended to distill related Commission Orders into recommended filing requirements for utility grid modernization proposals to ensure that core elements of economic evaluation are satisfied by the utility and that necessary information is available to the Commission to establish whether investments are in the public interest; second, it is intended to describe best practices for conducting economic evaluations of grid modernization investments; and third, it is also intended to complement and incorporate the Department's December 2020 Report called *Methods for Performance Evaluations, Metrics, and Consumer Protections for AMI and FAN*, filed in Docket No. E999/DI-20-627. The Guidance Document is intended to be generally applicable to any

⁸ "Energy and Environmental Justice: How States Can Integrate Environmental Justice Into Energy-Related Proceedings," James M. Van Nostrand (2012) <https://scholarship.law.edu/cgi/viewcontent.cgi?article=1021&context=lawreview>

utility grid modernization proposal regardless of which regulatory pathway a utility takes.⁹

The Department concludes that it intends to use the Synapse framework for its own purposes in evaluating grid modernization investments going forward and recommends that the Commission require the information in filings that would facilitate such evaluation.¹⁰

On February 25, 2022, the Department of Commerce filed its initial comments in this docket and attached a second report from Synapse providing comments on the Resilient Minneapolis Project (“RMP”) and the Distributed Intelligence (“DI”) certification requests.¹¹ In these Comments, DOC indicated its view that the IDP complies with the current filing requirements and made suggestions for future filings and modifications to the filing requirements so that the IDP filings requirements would align with the Guidance Document.¹² In Xcel’s Reply Comments, filed March 22, 2022, the Company took exception to the application of the Guidance Document principles to the DI and RMP certification requests.

CEV agrees with Xcel’s *procedural* objection to the formal application of the Synapse Guidance Document in this proceeding, and with the *content* and *procedural objection* of Renewable Energy Partners’ early and clear Reply about the value and local support for RMP. However, we agree with DOC that it would be valuable for the Commission to articulate a clearer standard of review for IDP cases. The principles in the Guidance Document provide a good foundation for further stakeholder discussions to inform a consistent and coherent framework for evaluating utility grid modernization proposals. We see the DOC’s recommendations regarding cost/benefit analysis and the incorporation of equity into the planning process as complementary efforts to enhance and advance the process. Moving forward, the Commission should ensure that all stakeholders and communities are involved in this important discussion early on, as an integrated *part of* IDP proceedings.

C. DER Forecasting

The Company agrees in its Reply Comments that it is important to align forecasts (including DER) between resource planning and distribution planning cases. However, Xcel requests that if the Commission chooses to adopt DER forecasting requirements in this IDP, the Commission

⁹ Comments of the Minnesota Department of Commerce, Division of Energy Resources, Docket No. E002/M-21-814, *In the Matter of Northern States Power Company d/b/a Xcel Energy’s Petition for Approval of the Transmission Cost Recovery Rider Revenue Requirements for 2021 and 2022, Tracker True-up, and Revised Adjustment Factors*, February 9, 2022, pp. 2-3.

¹⁰ *Id.* at 10.

¹¹ Comments of the Minnesota Department of Commerce, Division of Energy Resources, Docket No. E002/M-21-694, *Xcel Energy’s 2021 Integrated Distribution Plan and Request for Certification of Distributed Intelligence and the Resilient Minneapolis Project*, February 25, 2022.

¹² *See id.* at 26.

should ensure that such requirements are identical to the DER forecasting requirements the Commission recently adopted in Xcel's most recent IRP case. This is a reasonable request. CEV agrees that the requirements regarding DER forecasting should be identical across the IRP and IDP processes.

D. DER Filing Requirements

CEV's Initial Comments recommended that the Commission adopt two new filing requirements related to DER integration and benefits.¹³ Xcel disagreed with CEV's recommendations, stating that "an IDP is an informational filing" and therefore any programs or policies to mitigate barriers to DERs "would be developed in a separate proceeding." (Xcel Attach A at p. 23) With respect, Xcel appears to misunderstand the nature of CEV's DER-related recommendations. CEV is not asking Xcel to *develop* these DER programs through the IDP. We are asking the Commission to ensure that Xcel's IDP includes "a narrative description of programs and policies that will be implemented to mitigate barriers to DER integration," and to "provide a discussion of how the Company is pursuing opportunities to capture system-wide benefits through broad adoption of DER."¹⁴ Years of field-testing and research finds (and Xcel does not dispute) that DERs can provide distribution system benefits, if well-designed and implemented. Therefore, it is appropriate and increasingly important for utilities to thoroughly describe their programs to capture DER-related benefits in utility IDPs, and to provide the necessary cost and system data for those DER producers to design systems. The Commission should adopt CEV's recommended filing requirements to ensure that Xcel thoroughly describes in its IDPs how the Company intends to enable locally-owned DER to capture system-wide benefits for all.

E. Electrification Scenario Modeling

In its Reply Comments, the Company discusses several uses and applications of the new LoadSEER technology and responds to Fresh Energy's recommendations regarding modeling the Load-Modifying Impacts of DSM.¹⁵ The Company also discusses the use of Electrification Scenarios in forecasting future capacity requirements. It notes that Xcel is "currently working to more fully incorporate the impacts of transportation electrification and building electrification into our system-wide forecasts."¹⁶ CEV appreciates the additional insight into the Company's plans to enhance the granularity and accuracy of DER and electrification using this important new planning tool.

¹³ CEV Initial Comments, pp. 19-22.

¹⁴ *Id.* at 21-22.

¹⁵ See Xcel Comments, Attachment A, pp. 28-29.

¹⁶ Xcel Comments, Attachment A, pg. 30.

F. Locational Reliability and Equity Tools in Distribution System Planning

CEV's Initial Comments recommended requiring a locational reliability/equity analysis. In Reply, Xcel did not support a locational reliability filing requirement "because the locational reliability work is occurring in other regulatory forums – namely, in the Safety, Reliability, and Service Quality docket (Docket No. E002/M-20-406) and the Performance-Based Ratemaking docket (Docket No. E002/CI-17-401)."¹⁷ CEV does not agree that Xcel's work on locational reliability mapping tools in other dockets should preclude a locational reliability *analysis* that draws upon those tools as part of the IDP process. As we envisioned it, that analysis would draw upon and build upon the reporting and eventual performance metric development elsewhere, but in order to be useful, that analysis should be directly incorporated into the distribution system planning process.

The tools to understand whether distribution system spending and investment have resulted in equitable outcomes continue to evolve. As described in CEV's Initial Comments, Xcel and the Commission have taken important first steps by developing a map to visualize reliability and disconnection frequency by census block group. This effort continues to be a priority for CEV and our partners. But the Commission's work to develop a locational reliability metric is not an end in itself. The goal should be *outcome* focused: what steps can Xcel take to ensure that all customers have equitable access to safe, reliable, and affordable service? Our efforts are intended to integrate equity considerations into the processes that drive decision-making, which will then drive equitable outcomes.

The Company has stated unequivocally that providing safe, reliable, and affordable service to all customers is its goal. In this proceeding, the Company identifies this as "the backbone of distribution planning."¹⁸ We concur with that goal. The Commission should continue taking steps to measure how different spending and investment decisions designed to achieve that goal affect different populations of customers. By embedding equity in the IDP planning objectives, as recommended by CEV, the Commission can ensure that Xcel's investment decisions are aligned with this principle.

G. Reducing DER Interconnection Barriers

Proactive planning for high-DER futures: CEV strongly supports Fresh Energy and the City of Minneapolis's recommendations to begin proactive distribution planning with a goal to reduce DER interconnection costs, especially in low-income or other historically burdened communities. The traditional interconnection process assumes ad hoc DER growth, driven primarily by the choices of individual interconnection customers. As Fresh Energy observes, the current process does not clearly identify "what happens when forecasts and risk analysis reveal

¹⁷ Xcel Reply Comments, pg. 22.

¹⁸ Xcel 2021 IDP, pg. 1.

that distribution infrastructure needs to be upgraded to accommodate future distributed generation, electrification or DSM adoption.” (Fresh Energy Comments at 6) Fresh Energy recommends that Xcel begin *proactively* planning for grid investments that can facilitate DER integration and explore emerging best practices for allocating the costs of these grid investments. Said another way, Xcel’s clarity and transparency of system planning can help encourage more systematic and strategic DER deployment that will maximize grid benefits and opportunities for all. (*Id.*)

Prioritizing equitable interconnection access: The City similarly requests that the Commission require Xcel to use its IDP to plan for ways it can equitably reduce interconnection costs and barriers.¹⁹ The City points out that “equitable access to interconnection” is a key to the City achieving its goals of 100% community-wide renewable energy by 2030 and “the IDP is an appropriate place to anticipate and plan for deployment of distributed generation.”²⁰ The City specifically requests that “[t]he PUC require Xcel Energy to use existing AMI infrastructure and data, forecasting capabilities, and proposed areas of new spending including new distribution equipment and distributed intelligence, to reduce interconnection costs and time constraints.”²¹

CEV agrees with the City’s focus on proactive grid investments that can equitably reduce interconnection costs, especially in historically disadvantaged communities. Proactive planning can help enhance opportunities in communities that have historically not had access to the infrastructure required to participate in energy markets. The first step in establishing the criteria for prioritization is to determine how much new distributed generation capacity is made available by any given set of distribution system investments. This is a ratio. For every X dollars of investment in new wires and transformers, how many MW of new distributed generation can be installed? Establishing this ratio creates an iterative process that can inform distribution enhancement decision-making from the bottom up. The equity component comes into play as higher distribution network enhancement \$/MW ratios are prioritized for communities less able historically to participate.

This prioritization approach would also be consistent with the Commission’s directive, adopted in Xcel’s IRP Docket E002-RP-19-368, to “[d]esign 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.”²²

¹⁹ City of Minneapolis Comments at 18.

²⁰ *Id.*

²¹ *Id.* at 20.

²² Decision Option E15, adopted verbally during February 8, 2022 Deliberations; written Order pending.

In order to meet this objective, the Company needs to start with a better understanding of the *existing* state of DER access across its service territory and then begin planning *proactive* investments that can reduce interconnection costs and enhance hosting capacity in communities that have historically not had access to clean energy opportunities. Thus, CEV supports the City of Minneapolis recommendations to: (1) map equity indicators at the feeder level through the existing hosting capacity mapping effort, and (2) focus NWA projects in areas of higher energy burden, and prioritize energy efficiency and distributed energy resources in those areas.²³

H. Use of Discount Rates

DOC and Xcel disagree about the appropriate discount rate that should be applied to evaluate the costs and benefits of proposed utility grid modernization investments. Applying too high of a discount rate (the rate of return required by utility equity and debt holders) to customer savings in later years results in an underestimate of the value of future benefits that customers realize. As such, the discount rate applied by Xcel in its planning process can significantly affect the apparent benefit/cost of future projects.

Xcel responded very strongly to the DOC/Synapse position that the weighted average cost of capital (WACC) is *not* an appropriate discount rate for grid modernization investments. The Company characterized the Synapse Guidance Document as taking a “sweeping position” that a “societal or ‘low-risk’ discount rate” should be used by the Company for evaluating the cost-effectiveness of “grid modernization investments, other distribution system investments, and all other types of investments – including generation resources.” According to Xcel, this kind of “dramatic change” would be most appropriately considered “in a separate proceeding with the relevant stakeholders, including other utilities.”²⁴

The Company concludes that the WACC is the appropriate measure to use because it reflects Xcel’s actual opportunity costs:

WACC is the appropriate rate to use in evaluating the cost-effectiveness of proposed investments because it is the Company, not individual customers or society as a whole, that may be making these potential investments, and we use our capital to do so. That capital is either debt or equity and WACC represents the average cost we pay for that capital. WACC is thus an opportunity cost and, as such, is commonly used by private companies to evaluate potential investments.²⁵

²³ (City Comments at pp. 11-12)

²⁴ Xcel Comments, Attachment A, pg. 5.

²⁵ Xcel Comments, Attachment A, pg. 6.

CEV observes that the choice between WACC and some other discount rate is a methodological consideration that properly belongs in the IDP. CEV did not interpret the Synapse Guidance Document to recommend the broad application of a “low-risk” discount rate to *all* types of utility planning processes. Instead, CEV understands the Synapse recommendation to be that WACC should not apply in BCA analysis, but that does not necessarily imply that WACC is inappropriate for all types of planning processes. We do agree, however, that WACC is not the appropriate discount rate to apply when considering costs and benefits of projects from a societal or customer perspective. More discussion of this important issue is warranted to ensure that all stakeholders understand the tradeoffs and impacts associated with the choice of discount rates in utility planning proceedings.

I. Certification Requests

Resilient Minneapolis Project Certification Request

CEV continues to recommend approval of certification of the Resilient Minneapolis Project (“RMP”). Xcel’s proposal for the three RMP pilot projects is the result of a lengthy conversation and has been undertaken in coordination with and full support of the three community partners engaged. The three local partners themselves conducted meaningful community engagement that is the product of their many years of being trusted community institutions.

The Department’s February 25, 2022 Comments and attached Synapse report propose a framework for evaluation of grid modernization proposals and apply that framework to Xcel’s two certification requests in this docket.

Synapse’s report found that Xcel’s application for certification of the RMP to be lacking information that would be required to do the benefit-cost analysis, including:

- Lack of relationship between the RMP proposal and the Company’s long-term planning;
- Lack of clear goals;
- Low benefit to cost ratio;
- Lack of effort to establish metrics and goals; and
- Lack of consideration of alternatives.²⁶

Synapse recommends that Xcel should provide additional details and analysis on several key aspects of the project, including articulation of measurable goals, additional quantification of benefits, and consideration of alternatives. In conclusion, Synapse finds the incompleteness of the proposal prevents a determination about the cost-effectiveness of the application. It also notes

²⁶ DOC Comments, Attachment 1, pp. 23-33.

that “the decision about whether to certify the proposed investments should account for both cost-effectiveness and other considerations.”²⁷

REP filed reply comments on April 1, 2022 taking exception to Synapse’s conclusion. Simply stated, REP argued that Xcel has met its requirement to clearly state the goals of the RMP and its relationship to the planning goals and has demonstrated that the project is in the public interest.

REP concludes:

The Minneapolis Resiliency Project is a first step in many ways that will be important for the deployment of more distributed, resilient and equitable energy systems in Minnesota. We encourage the Commission to approve it based on its ability to make an important contribution to greater understanding of how projects like these can address resiliency, equity and environmental justice issues, while also serving the greater public interest.²⁸

CEV continues to support certification of the RMP. REP’s comments document the multitude of qualitative benefits that will accrue to the community from these projects. The community benefits from targeted community resilience projects are potentially significant during the more frequent extreme weather events that are expected due to climate change. Such targeted projects can provide access to heated/cooled space, food, and clean water in communities during extended outages.

On the community support side, in some cases it is the presence of this new collaboration with local partners that has fostered the beginnings of a working relationship between Xcel and the community to win these important resilience projects, even amidst skepticism about the Company’s intentions and overall underinvestment in environmental justice communities, such as those revealed in these quotes from a recent Northside Greenzones meeting:²⁹

"We support him [Jamez] - and he is northside, he grew up north side. He sees our vision. He’s a property owner trying to make a difference, and we support him. To give back to our community is exactly what he’s doing and that’s what we expect you to do especially when you want to come in.[...] What I see that you’re doing is ignoring the bigger picture for our future. For our future, my future, your future. Because It’s not just over northside, southside - It’s Minneapolis and we’re all connected. [He] is doing something to give back to our community - to our youth."

²⁷ Synapse Energy Economics, *Evaluating the Grid Modernization Proposals in Xcel Energy’s 2021 IDP*, pg. 33.

²⁸ Reply Comments of Renewable Energy Partners, Inc., *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. E-002/M-21-694, April 1, 2022, pg. 3.

²⁹ See Northside Greenzones meeting January 21st, 2021, available at <https://www2.minneapolismn.gov/government/departments/coordinator/sustainability/policies/green-zones-initiative/>.

"Why is the dollar amount so low? We're getting scraps here and that's historic. For me, I need Xcel to step it up and really put their money where their mouths are in terms of resiliency and equity. When we look at the billions of dollars that you guys are talking about investing, and you look at the amount of people of color in our community the dollars aren't equitable. So if we are faced with higher COVID-19 death rates, then the money needs to be allocated in a way that reflects that urgency. [...] So when you look at the entire state - and we're talking about COVID-19 dollars - and then you're looking at the communities that are facing the worst COVID-19 rates, which means a lot of us are essential workers so we are exposed a lot, and we're also going to have trouble with people staying in employment. So when you see that we are facing the worst of the worst, how now are you going to change the dollar amounts that you are investing to be equitable to what is actually more urgent? To prioritize those who need it the most?" (Northside GreenZones meeting, Jan. 2021)

Certification of RMP should be approved, and the three local partners and communities should be supported during the course of the pilot by the Commission and the Company to define clear metrics of success for the projects and define how they will measure - and the Company will report - benefits and lessons learned.

Distributed Intelligence Certification Request

While CEV did not take a stance on the DI investments in our Initial Comments, we do want to offer some general observations. The Company is proposing both customer-facing and non-customer facing upgrades. The Company's customer-facing investments in DI (supported by both the City of Minneapolis and Fresh Energy) should be informed by what customers have expressed that they want from their electricity grid. Utility investments should not be based on a shallow evaluation of consumer trends that is disconnected from local communities, but should be grounded in community-engagement about what is needed to reduce energy burden, strengthen their local economies, and transition to resilient energy sources. Not all upgrades may be supported or needed by users when evaluated against cost. Community engagement requires a more labor-intensive initial approach to evaluating grid modernization investments, but it is a far more cost-effective and relevant approach over the long term. It also resurfaces the principle raised in our Initial Comments that the Company must incorporate and integrate localized energy and climate plans (County, City, neighborhood, etc) to inform its distribution system investments. For those jurisdictions that have not yet developed local plans, the Company can solicit or prompt those through its relationships via Xcel employees that sit on boards and Commissions throughout its service territory. The Company does not need to (and in many ways is less well-equipped to) perform this labor itself, but it must proactively seek community feedback and be responsive to the input it receives. **It is not clear from the record that Xcel has solicited community engagement on its customer-facing investments. This should be a**

requirement for any future IDP proposals particularly when attached to such significant price tags.

On the non-customer-facing investments, CEV has no reason to dispute the Company's position that it is important for Xcel to increase visibility into its distribution grid. However, we wonder to what extent this data will be "visible" and shared with other stakeholders and communities who seek fair access to the grid? Our primary concern here is that communities/ratepayers will pay for Xcel's significant investments to enhance grid visibility while the knowledge of how to make the grid most affordable, most resilient, most equitable will remain proprietary information. To the maximum extent practicable, the data generated by Xcel's Distributed Intelligence program should be made available to stakeholders seeking to model or propose alternatives to traditional grid investment. Even the "non-customer-facing" investments should be subject to transparency and stakeholder engagement and should also be designed to be responsive to local plans. **It is not clear from the record that Xcel has solicited community engagement on the "non-customer-facing" investments regarding opportunities to enhance grid visibility for all. This should be a requirement for any future IDP proposals, particularly when attached to such significant cost.**

III. CONCLUSION AND SUMMARY OF RECOMMENDATIONS

In conclusion, CEV continues to recommend acceptance of Xcel's 2021 Integrated Distribution Plan by the Commission with CEV's key recommended changes to the Commission's IDP planning objectives and filing requirements. As described in our Initial Comments, the Commission should:

1. Amend its IDP Planning Objectives and Filing Requirements to Explicitly Incorporate Equity;
2. Require a More Transparent Rate Impact Assessment and Affordability Analysis;
3. Strengthen its Filing Requirements Related to DER Integration and Deployment;
4. Take Steps to Further Improve the Alignment of Resource Planning, Distribution Planning, and Transmission Planning; and
5. Ensure That DER Modeling, Forecasting, and Program Planning Functions are Treated Consistently in Xcel's Distribution and Resource Plans.

We thank you for your consideration.

Respectfully submitted,

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CERTIFICATE OF SERVICE

Docket No. E002/M-21-694

I, Heather Vogel, hereby certify that I have this day, served a true and correct copy of the *Reply Comments of Community Power, Environmental Law & Policy Center, and Vote Solar* to all persons at the addresses indicated on the attached service list by electronic filing, electronic mail, or by depositing the same enveloped with postage paid in the United States Mail at Chicago, Illinois.

April 11, 2022

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