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Minneapolis, MN 55401

March 30, 2022

—Via Electronic Filing—

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101

RE: AGIS RELATED SCOPING & PROCEDURES COMMENTS
TRANSMISSION COST RECOVERY RIDER
DOCKET NOS. E002/M-21-814 AND E002/M-20-680

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission these Comments on AGIS Related Scoping and Procedures as noticed in the Commission's February 7, 2022 NOTICE OF COMMENT PERIOD and subsequent extension notices on March 4, 2022 and March 16, 2022 in the dockets referenced above.

We have electronically filed this document with the Minnesota Public Utilities Commission and copies have been served on the parties on the attached service lists. Please contact me at bria.e.shea@xcelenergy.com or (612) 330-6064 or Jody Londo at jody.l.londo@xcelenergy.com or (612) 330-5601 if you have any questions regarding this filing.

Sincerely,

/s/

BRIA E. SHEA
DIRECTOR, REGULATORY & STRATEGIC ANALYSIS

Enclosures

c: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

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

Chair
Vice-Chair
Commissioner
Commissioner
Commissioner

IN THE MATTER OF THE PETITION OF
NORTHERN STATES POWER COMPANY
FOR APPROVAL OF THE TRANSMISSION
COST RECOVERY RIDER REVENUE
REQUIREMENTS FOR 2021 AND REVISED
ADJUSTMENT FACTORS

DOCKET No. E002/M-20-680

IN THE MATTER OF THE PETITION OF
NORTHERN STATES POWER COMPANY
FOR APPROVAL OF THE TRANSMISSION
COST RECOVERY RIDER REVENUE
REQUIREMENTS FOR 2021 AND 2022,
TRACKER TRUE-UP, AND REVISED
ADJUSTMENT FACTORS

DOCKET No. E002/M-21-814

COMMENTS

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission (Commission) these Comments regarding procedure for the Company's Advanced Grid Intelligence and Security (AGIS) investments contained in our 2021 Transmission Cost Recovery (TCR) Rider, in response to the Commission's February 7, 2022 NOTICE and subsequent extension notices the above-referenced dockets.¹

The Company's investments in AGIS projects certified by the Commission (which the Commission defined as Advanced Metering Infrastructure (AMI) and Field Area Network (FAN)),² as well as other grid-modernization investments certified for

¹ The February 7, 2022 Notice of Comment Period also requests Comments and Reply Comments on the substance of the Company's TCR Petition; we will provide such comments in a future filing.

² See Order Accepting Integrated Distribution Plan, Modifying Reporting Requirements, And Certifying Certain Grid Modernization Projects at page 14, Docket No. E002/M-19-666 (July 23, 2020).

recovery through the TCR Rider (Advanced Distribution Management System (ADMS), LoadSEER (our advanced distribution planning tool), and the residential time of use rate pilot (TOU Pilot)) are well underway, or are already in service based on approvals we have received from the Commission and direction provided by our stakeholders and Minnesota state policy. We have fulfilled all of the considerable requirements of applicable Commission Orders related to these investments, and we should be permitted to recover our prudently incurred costs relating to them through the TCR Rider. We appreciate the opportunity to comment on whether this docket should be bifurcated to provide additional process related to the AGIS investments. However, it is entirely unclear what, if any, issues are disputed and, therefore, what bifurcation or a contested case would accomplish – except casting uncertainty on and further delay in cost recovery.

Before addressing the specific topics sought for comment, we detail the extensive procedural process related to our AGIS and other grid-modernization investments that has already occurred over the last seven years. In 2015, the Company began discussing its comprehensive plans for modernizing the electric grid and, over the course of several subsequent years and proceedings, outlined a set of multi-year investments foundational to a next generation energy grid as part of our AGIS initiative. Over this seven-year period, there has been extensive dialogue and record development on the Company's AGIS plans and proposals, including work in 2020 by the Department of Commerce (Department) to examine metrics, develop performance evaluation methods, and ensure consumer protection to be applied to our AMI and FAN projects. We have collaborated with our stakeholders to better understand their interests and incorporate their input into our plans. The sum of these efforts has led to the Commission developing and adopting a comprehensive set of filing requirements to evaluate our grid modernization investments.

Guided by the desires of the Commission, our stakeholders, and state policy, we embarked on a multi-year path to modernize the distribution grid. In 2015 and 2016, we sought, and obtained, certification of the ADMS. In 2017, the Commission approved recovery of a portion of ADMS costs through the TCR Rider, and in 2021, approved recovery of another portion of ADMS costs. ADMS now has been fully deployed in our Minnesota service territory (currently expected to come-in approximately \$8 million under budget), and our current TCR Petition requests cost recovery of ADMS revenue requirements through 2022.

Additionally, in 2017 and 2018, we requested and received certification of a TOU Pilot that uses smart meters, and in 2019, we requested and received certification of an advanced planning tool – LoadSEER (f/k/a Advanced Planning Tool or APT) – and two key foundational AGIS investments: (1) AMI and (2) a FAN. LoadSEER is

fully in-service, and AMI and FAN are being implemented and will replace our currently obsolete Automated Meter Reading (AMR) meters and service.

The statutory framework for utility grid modernization investments that was established in 2015 is designed for timely consideration of and cost recovery of proposed investments that the Legislature determined are in the public interest. Minn. Stat. § 216B.2425 vests authority in the Commission to make those public interest determinations and the authority to certify, certify as modified, or reject proposed investments. In accordance with this statutory framework, we have sought certification of the foundational grid modernization initiatives noted above. We have complied with all of the Commission's informational requirements related to cost recovery of our certified grid modernization investments. And, in proceeding to order equipment and deploy the FAN and AMI meters, we relied on the Commission's July 23, 2020 certification decision – supported by robust information in the 2019 Integrated Distribution Plan (IDP) – that recognized AMI and FAN as core grid-modernization investments that are necessary for modernizing the distribution system and enhancing reliability, improving security, and increasing energy conservation opportunities – and that our AMI and FAN technologies are two-way meters, which is explicitly included in Minn. Stat. § 216B.2425, subd. 2.³

The Commission's July 2020 Order also clearly distinguished between the investments – defining the AGIS components as AMI and FAN in Order Point No. 7, with separate ordering points reinforcing that distinction – and making its certification determination regarding LoadSEER in Order Point No. 14, with its own parameters regarding future cost recovery. Similarly, the cost recovery requirements for transmission investments and previously certified grid modernization investments were specific to those investments. Given this background, we understand the bifurcation question posed in the Commission's Notice to be asking about bifurcating AMI and FAN from the other investments included in our TCR Petition.

AMI and FAN are substantial investments and operational undertakings. We will be replacing 1.4 million electric meters in Minnesota alone (not to mention our other jurisdictions) and installing FAN infrastructure across our Minnesota service area to facilitate two-way communications with the AMI meters. As detailed in our certification request and our TCR Petition, this work needs to be completed by the end of 2024 due to the obsolescence of our current meters and the end of our current meter reading service. Given the absolute timeline and significance of our AMI and FAN investments, we submitted a Petition for cost recovery of these and other transmission and grid modernization investments in our November 2021 TCR Rider.

³ See Order at page 14, Docket No. E002/M-19-666 (July 23, 2020).

That Petition is well-underway and includes all of the required information from the applicable Commission Orders that will allow interested parties to provide their input as part of the typical notice and comment procedure, so that the Commission can evaluate and make a cost recovery decision. We are unaware of any disputed issues, much less “contested material facts.”⁴ Bifurcating a portion of the investments out of the TCR – namely AMI and FAN, otherwise categorized as AGIS – or putting those investments on an uncertain cost recovery path is not necessary, warranted, or in the public interest.

We are aware that Order Point 13 of the Commission’s July 23, 2020 Order contemplated that Commission would make a procedural and scoping decision on our AMI and FAN investments prior to making a determination on cost recovery. Indeed, the Commission required the Company to submit a filing with its preferred procedural paths, as well as assessment of a potential contested case, at least 60 days prior to submitting a rider petition. We submitted that filing August 28, 2020 – and on September 23, 2020, the Commission issued a notice for Comments regarding “what procedural path is appropriate for prudence and reasonableness review of Xcel Energy’s AGIS for cost recovery in the Transmission Cost Recovery Rider.”⁵ All comments were submitted by October 30, 2020.

The Commission also requested the Department to submit a report by November 1, 2020 (later changed to December 1, 2020) that includes recommendations on metrics, methods for evaluating performance, and consumer protections or other conditions that “should be applied to the certified projects (AMI and FAN).”⁶ We participated in the stakeholder process that informed the Department’s Report, and we provided comments on September 25 and October 30, 2020. Subsequently, we incorporated the relevant recommendations into the metrics and reporting proposal in our 2021 TCR Petition, acknowledging the recommendations on metrics we believed were appropriate and could be reported, consistent with the Commission’s requirement that certification of the AGIS projects “is made with the recognition, and acceptance from Xcel, that all future cost recovery will be based upon the Company accomplishing Commission-approved metrics and performance evaluations for the certified projects” and that “[a]ny future proposals for cost recovery of investments certified in this Order must be accompanied by a proposal for specific metrics and

⁴ Minn. R. 7829.1000.

⁵ See IN THE MATTER OF THE DEPARTMENT STAKEHOLDER PROCESS INFORMING THE REPORT ON THE METRICS, PERFORMANCE EVALUATION METHODS, AND CONSUMER PROTECTION CONDITIONS TO BE APPLIED TO XCEL ENERGY’S ADVANCED METERING INFRASTRUCTURE AND FIELD AREA NETWORK PROJECTS CERTIFIED IN DOCKET NO. E002/M-19-666, Notice of Comment Period at page 1, Docket No. E002/M-20-680 (September 23, 2020).

⁶ Order Point No. 9, Docket No. E002/M-19-666 (July 23, 2020).

evaluation methods, and a detailed plan describing how the company will maximize the benefits of the AGIS investments for ratepayers.”⁷ All of these requirements and actions were aligned with a timely cost recovery process for the certified AMI and FAN projects, as contemplated by the statutory framework, and the Commission’s Order. However, there has been no action taken on the appropriate process for next steps regarding the investments. And now we are at a critical juncture – having incurred costs in 2020 and 2021, relying on the affirmative certification decision, and following through with our stated intent to seek cost recovery for AMI and FAN through the TCR rider following a standard notice and comment process.

We are concerned about the impacts on our customers and the Company of any additional process or uncertainty with respect to our AMI and FAN investments. For example, the Department’s unilateral development and introduction of a second report it calls a Guidance Document in February 2022 – 14 months after the December 1, 2020 date established by the Commission – that includes significant new and additional requirements and standards it intends to retroactively apply to the grid modernization investments in our TCR Petition (and our 2021 IDP).⁸ This document was developed without any utility or stakeholder input and is inconsistent with prior Commission Orders. Consideration of its retroactive application in this docket will only create further delays in decisions regarding cost recovery, which could create accounting and implementation issues, and translate to service impacts to customers and unnecessary burdens on all parties in the future.

We understand that grid modernization investments are relatively novel in Minnesota and that the Department wishes to adopt additional or different requirements to evaluate these investments. However, the Department’s Guidance Document is not timely with respect to our grid modernization investments in this proceeding. If the Department wishes to propose new requirements and standards, it should do so in a separate docket applicable to all utilities that involves substantial stakeholder engagement, and that includes appropriate procedural process and evaluation by all interested parties.

In the meantime, we have fulfilled all of our requirements and reasonably relied on the Commission’s certification decision in proceeding with these significant investments. Given the substantial record development, information we have provided to parties, and the process that has already taken place regarding these investments, we do not believe substantial additional procedure is necessary. That said, should the Commission believe it is still necessary to make a procedural and

⁷ Order Point No. 8, Docket No. E002/M-19-666 (July 23, 2020).

⁸ See Department Letter in Docket No. E002/M-21-814 (February 9, 2022).

scoping decision regarding AMI and FAN before proceeding to evaluate the merits of our 2021 TCR Petition, there is sufficient information in the record for the Commission and stakeholders to evaluate our investments through a standard notice and comment procedure. We continue to believe that a contested case under Minn. R. 7829.1000 is not warranted because there are no contested material facts in this matter.

Similarly, we do not believe there should be a separate completeness review of the proposed investments as a distinct part of the procedural process. This is neither called for by Minnesota rule or law, nor needed in this case. As explained in Section I below and detailed in our compliance matrix provided as Attachment B, we have complied with all of the Commission's requirements and we adopted all of the relevant metrics and reports that the Department recommended in their December 1, 2020 Report, and included them as part of our AMI and FAN proposal in our 2021 TCR Petition. We do not believe any *more* information is necessary, and we are concerned about the impacts on our customers and the Company of any additional process or uncertainty with respect to our AMI and FAN investments.

We recognize that these are large-scale investments, but large-scale investments are commonly recovered through riders in Minnesota using the Commission's existing robust miscellaneous filing procedures – which should also be applied to these investments. Given the timeline for these procedural comments, where Reply Comments are due April 11, 2022, we believe setting a revised Comments due date on the merits of our Petition for June 2, 2022 with Replies June 23, 2022 would be appropriate. This timeline would also allow the Commission time to consider the record and make a cost recovery decision for at least 2020-2021 AMI and FAN revenue requirements before December 31, 2022, which is necessary to avoid revenue recognition issues under Generally Accepted Accounting Principles (GAAP) accounting rules that specify revenues must be collected within 24 months following the end of the annual period in which they are recognized. Since some of the costs eligible for recovery in this proceeding date back to 2020 when the Commission certified the investments, an additional delay in this proceeding could cause accounting challenges if new rates are not implemented by the end of 2022.

We have had preliminary discussions with the Department regarding an alternative approach, should the Commission believe additional process beyond the substantial record development that has already occurred and the rigorous process a miscellaneous proceeding provides. We were not able to come to an agreement in advance of these Comments, but we are committed to continuing that dialogue toward a constructive proposal in Reply Comments, due April 11, 2022.

The balance of these Comments explains the extensive procedural process that has already occurred concerning our AMI and FAN investments over a significant period of time. No additional process beyond a standard notice-and-comment proceeding is needed, as we have fulfilled all of our requirements and reasonably relied on the Commission's certification decision in proceeding with these significant investments. We also address our view of a contested case for AMI and FAN and the Department's introduction of its Guidance Document in more detail.

BACKGROUND

Before addressing the specific topics noticed for comment, we briefly recount the history of the Company's filings related to our AGIS investments to provide context for our comments. In recent years, the Company has provided robust information regarding its grid modernization implementation plans, costs, and benefits in a variety of proceedings. Additionally, the Commission has issued a number of applicable Orders that are relevant to this proceeding.

The Company proposed its first grid modernization project, the ADMS in 2015. After a thorough review of the proposed project, the Commission certified ADMS in its June 28, 2016 Order in Docket No. E002/M-15-962. Following this certification, the Company sought and obtained cost recovery for ADMS through the TCR Rider. The Company made its initial cost recovery request in its November 8, 2017 TCR Petition. In its September 27, 2019 Order in Docket No. E002/M-17-797, the Commission approved recovery of ADMS costs through the TCR Rider and established requirements for future cost recovery proceedings related to ADMS as well as other future AGIS investments. In addition, Order Point 10 of this 2019 Order authorized the Department to engage a consultant to assist the Department with their review and recommendations to the Commission on our grid modernization investments. The Company requested recovery of ADMS costs for 2019 and 2020 in its November 15, 2019 TCR Petition in Docket No. E002/M-19-721, which the Commission approved in its December 10, 2021 Order in that docket.

The Company subsequently sought and obtained certification of other grid-modernization investments, including a time-of-use pilot program in 2018 in Docket Nos. E002/M-17-775 and M-17-776, which the Commission certified in its August 7, 2018 Order in those dockets. In connection with our 2019 IDP, the Commission certified the Company's proposed investments in AMI, FAN, and LoadSEER.⁹ In that filing, we provided comprehensive information for the proposed investments, consistent with the requirements of the September 27, 2019 Order referenced above,

⁹ Docket No. E002/M-19-666.

among other things. Despite this robust information, the Department chose to not engage substantively in the docket—issuing no discovery and failing to provide meaningful evaluation of the request;¹⁰ instead simply asking for a contested case without identifying what contested issues of material fact it believed warranted such an approach.

In accepting our 2019 IDP and certifying the noted investments, the Commission established further requirements for future AGIS investments in its July 23, 2020 Order. For example, the Order requires that:

When Xcel makes any future cost recovery proposal, in addition to requirements from previous orders, it must include:

- a. a discussion of mechanisms that will be employed to maximize cost reductions and minimize cost increases, and
- b. a demonstration that the utility has thoroughly considered the feasibility, costs, and benefits of alternatives, and that the proposed approach is preferable to alternatives. In discussing the alternatives, Xcel should compare different types of the same technology, for example, by comparing different AMI meters.

Among other things, the Order also required the Company to file “preferred procedural paths forward” for cost recovery for the certified investments. It also required the Department to file a report, by November 1, 2020, with “recommendations on specific metrics, detailed methods for evaluating performance, and consumer protections or other conditions, including cost caps” informed by a stakeholder process that the Company was required to participate in.

Consistent with the July 2020 Order, in Docket No. E002/M-20-680 (the Procedural Paths Forward docket), the Company filed its preferred procedural paths on August 28, 2020 and outlined three potential paths forward:

- (1) a standard miscellaneous filing;
- (2) a miscellaneous filing procedure that included Company-sponsored workshops and/or technical conferences; or
- (3) a contested case proceeding.

At that time, the Company explained that a standard miscellaneous filing procedure was appropriate. With respect to the second option, we indicated that we would be open to hosting additional workshops, but did not think it was necessary. With

¹⁰ The Department issued one discovery question on January 29, 2020 requesting the Company provide its responses to all information requests directed to the Company in the E002/M-19-666 docket to-date and going forward.

respect to option 3, because we did not believe there were any material facts in dispute, we did not believe a contested case proceeding was necessary. We also explained that, if the Commission ordered a contested case proceeding, we preferred an expeditious schedule, so that we could resolve the issues and move forward to cost recovery.

We actively participated in the Department's stakeholder workshop it held as part of its investigatory metrics, performance, and consumer protections for the Company's AMI and FAN investments in Docket No. E999/DI-20-627 on October 23, 2020. And, after presenting at the Department's workshop and identifying a topic of particular interest to stakeholders, we held a follow-up workshop on November 20, 2020, which outlined the Company's efforts to understand customers' preferences, considerations, and thoughts regarding the benefits and value of the advanced grid.

On December 1, 2020, the Department filed its Report on Methods for AMI and FAN Performance Evaluations, Metrics, and Customer Protections.¹¹ Although there has not been Commission action on the Department's Report, we adopted all of the relevant metrics that the Department recommended, and included them in the metrics and reporting proposal contained in Section XI of Attachment 4 of our 2021 TCR Petition.

On February 9, 2022, without any prior notice, much less discussion and coordination with utilities and other stakeholders, the Department filed a new "Guidance Document" that conflicts with prior Commission Orders and that the Department says it intends to apply to all utility grid modernization proposals, whether the Commission adopts it or not. In practice, the Department retroactively applied the Guidance Document to the grid modernization certification proposals contained in our November 1, 2021 IDP and we understand also intends to retroactively apply it to the grid modernization investments contained in our November 2021 TCR Petition.

The timeline and discussion above illustrate the breadth of these proceedings and the robust process that has led to the development of informational requirements with respect to the AGIS investments included in our 2021 TCR Petition. This history is further summarized in tabular form in Attachment A to this filing.

The Commission and parties have robust data on costs and benefits, as well as proposed metrics and reporting, to fully review our cost recovery proposal. As

¹¹ While Order Point 9 of the Commission's July 23, 2020 Order in Docket No. E002/M-19-666 required the Department to file its report by November 1, 2020, the Department sought and received an extension, and filed its report on December 1, 2020.

further discussed in Section I below and detailed in Attachment B, our 2021 TCR Petition fully complies with all of the required information set forth in the Commission's Orders.

COMMENTS

As noted above, these Comments are limited to the AGIS-Related Scoping and Procedures topics set forth in the Commission's February 7, 2022 Notice of Comment Period. We intend to provide further comments with respect to topics specifically related to the substance of the Company's pending TCR Petition, consistent with the February 7, 2022 Notice, in a subsequent filing.

Below, we first address how the Company's request for recovery of costs related to AGIS investments in the pending TCR Petition complies with all applicable Commission Orders, including the July 23, 2020 Order in Docket No. E002/M-19-666, and the September 27, 2019 Order in Docket No. E002/M-17-797. Second, we discuss why we believe decisions related to AMI and FAN costs should not be bifurcated from other Rider-eligible costs. Finally, we discuss the Company's concerns with the Department's recently filed Guidance Document related to grid modernization investments.

I. THE COMPANY'S TCR PETITION COMPLIES WITH ALL RELEVANT COMMISSION ORDERS

The Company's TCR Petition, filed on November 24, 2021 includes cost recovery requests for several advanced grid investments that were certified by the Commission at different points in time and with differing requirements based on applicable Commission Orders. Our Petition complies with the applicable requirements of the September 27, 2019 and July 23, 2020 Orders and all other requirements the Commission has specified for the respective investments. The Orders relevant to the specific investments are summarized below, and Attachment B to these Comments is a compliance matrix that details where within our Petition each requirement is discussed.

A. The Company Complied with the Commission's Requirements for Advanced Distribution Management System (ADMS)

In its September 27, 2019 Order in Docket No. E002/M-17-797, the Commission approved recovery of ADMS costs through the TCR Rider. Two separate Order points were included to distinguish cost recovery requests for ADMS (which was previously certified by the Commission) from cost recovery requests for future AGIS

investments. The September 27, 2019 Order set forth filing requirements for future ADMS cost recovery requests through the TCR Rider, as well as a requirement for the Company to submit annual reports, which we have filed in January each year since 2020. As reflected in Attachment B to these Comments, our TCR Petition includes the required information supporting cost recovery, complying with both Commission Orders referenced above. Detailed information on ADMS was provided in Attachment 2 to our November 1, 2021 TCR Petition.

B. The Company Complied with the Commission's Requirements for AMI and FAN

The Commission certified the AMI and FAN investments in its July 23, 2020 Order in Docket No. E002/M-19-666, which permits the Company to request cost recovery under the TCR Rider pursuant to Minn. Stat. § 216B.16, subd. 7b. Prior to the Company's request for certification of the investments, the Commission issued the September 27, 2019 Order, which included detailed requirements for future requests for cost recovery of AGIS investments – and the Company included the applicable information in both its certification request for the investments and the pending TCR Petition. Further, in certifying the AMI and FAN investments, the July 23, 2020 Order included a number of requirements for future cost recovery proposals. As detailed in Attachment A to these Comments, our November 1, 2021 TCR Petition includes the required information to support cost recovery, complying with both Commission Orders referenced above. Detailed information on AMI and FAN was provided in Attachment 4 to our TCR Petition.

C. Other Grid Modernization Projects

Two other grid modernization projects were certified by the Commission and thus eligible for cost recovery in the TCR Rider: (1) LoadSEER (previously referred to as the Advanced Planning Tool), and (2) the residential TOU Pilot.

LoadSEER was certified in the Commission's July 23, 2020 Order, which distinguished LoadSEER from its certification of AMI and FAN and as such, it is subject to separate conditions and filing requirements. We provided the required information for LoadSEER in Attachment 5 to our November 1, 2021 TCR Petition.

The TOU Pilot was certified by the Commission in its Order dated August 7, 2018 in Docket Nos. E002/M-17-775 and E002/M-17-776. Detailed information on the TOU Pilot, including project implementation, cost, and benefit details, was provided in Attachment 3 to our November 1, 2021 TCR Petition.

II. BIFURCATION OF DECISIONS RELATED TO AGIS AND NON-AGIS COSTS IS NOT WARRANTED

The Company understands the Commission's inquiry on this topic to be considering the most efficient way to assess the Company's request for recovery of AMI and FAN costs through the TCR Rider, given the scale of these projects compared to past grid modernization investments, and grid modernization investments being different than the large-scale transmission investments traditionally contained in the TCR Rider. That said, we do not believe bifurcating cost recovery decisions for allowable investments under the TCR Rider is warranted in this docket. First, bifurcation would make the process for the TCR Rider markedly different from other riders and could potentially conflict with the authorizing statute. Second, such a process would likely only further delay an already protracted proceeding that has seen substantial record development. Third, depending on how the proceeding is bifurcated, it could create substantial logistical issues relating not only to the process within the docket, but also in how we implement the TCR Rider adjustment factors and how that affects customers.

A. Bifurcation Creates Inconsistency with Other Riders and Minnesota Statutes

Rider proceedings are not new or novel in Minnesota. At one time, transmission investments and renewable energy investments were newly eligible for rider recovery, just like advanced grid investments were new in 2015. And while advanced-grid investments are new technology, there is nothing so unique about them that requires an entirely new procedural process beyond that which is already established.

The only factor that would appear to argue for treating grid modernization-related investments differently than others recovered through riders is that, when certified, such investments are only *eligible* for recovery through the TCR Rider – they are not *approved* for recovery through the Rider. But that does not require a novel process. In the parallel context of the Renewable Energy Standard (RES) Rider, the Company has sought and obtained cost recovery for: (1) projects the Commission expressly said could be recovered through the Rider, and (2) others for which there is no prior authorization.¹² In the case of the latter, then, the Company has to make a further case for rider recovery in the Rider proceeding itself. That is consistent with the approach the Company has taken for grid modernization-related investments in the TCR Rider to-date, and statutory framework that determined certain grid modernization investments as certified by the Commission are in the public interest.

¹² See Docket Nos. E002/M-19-732 and E002/M-17-694.

Specifically, it is consistent with Minn. Stat. § 216B.16, subd. 7b, the TCR Rider statute, which authorizes the Commission to “approve a tariff mechanism for the automatic annual adjustment” (emphasis added) of costs relating to both certain transmission facilities, as well as “distribution facilities that are certified” under Minn. Stat. § 216B.2425. Bifurcating the process for considering grid modernization-related costs from non-grid modernization costs in considering the TCR would be in tension with the statute’s contemplation of a single rider recovery mechanism for both qualifying transmission and qualifying distribution grid modernization investments.

Additionally, as discussed below, bifurcating this proceeding would likely further delay Commission consideration of the costs of the Company’s grid modernization investments, which would appear to conflict with the legislature’s intent in allowing annual rate adjustments for grid modernization costs through the TCR Rider. As with other rider authorization statutes, when Minn. Stat. § 216B.2425 (State Transmission and Distribution Plan) and Minn. Stat. § 216B.16, subd. 7b (Transmission Cost Adjustment) were initially enacted, they created a regulatory path for timely cost recovery of critical transmission investments. These statutes were amended in 2015 to include transmission and distribution grid modernization investments, recognizing that timely cost recovery for such efforts also was important to the state and utility customers. Were bifurcation to unnecessarily slow down the approval of such investments, it would conflict with this legislative intent.

B. Bifurcation Causes Timing Concerns

As we have noted in many prior filings, the AGIS investments at issue – AMI and FAN – are part of the Company’s long-term grid modernization strategy. Certification of grid modernization projects to-date has been critical in allowing the Company to move forward with implementation plans, and we have been transparent about our intent to include these costs in the TCR Rider. The Commission’s decision on cost recovery for AMI and FAN is the next step, so that we may complete our AMI and FAN initiatives at an appropriate pace to replace our currently obsolete 1.4 million AMR meters. While there are no specific statutory timeframe constraints relative to a cost recovery decision on our TCR Rider proposal, a determination on whether to bifurcate cost decisions under the TCR should include consideration of timing.

The process for cost recovery related to the Company’s investments in AMI and FAN has already taken years, beginning with the filing of the Company’s IDP in November 2019 requesting certification of AMI and FAN. At the same time as that filing, the Company filed a general rate case that it subsequently withdrew. But because that

case included costs related to AMI and FAN, both the case and the IDP included substantial information, required under the September 27, 2019 Order, related to cost recovery for the investments. Based on this robust record, the Commission certified the Company's investments in AMI and FAN, rather than referring the matter to a contested case, as the Department requested.

Having withdrawn the rate case, the Company anticipated seeking recovery of the investments in a November 2020 TCR Rider filing. Ahead of that Rider Petition, and consistent with the July 23, 2020 Order, the Company made a filing outlining its proposed procedural path for consideration of our AMI and FAN investments in the TCR, noting a standard notice-and-comment proceeding would be adequate. Although parties commented on the Company's proposed procedural path, the Commission never heard the matter or issued an Order. As the Company waited for an Order providing guidance on the appropriate procedural path forward, and in light of a significant number of proceedings that were also requiring Agency resources, we did not seek recovery of AMI and FAN in November 2020 as initially contemplated. But, by November 2021, further delay was no longer an option, and the Company filed the pending TCR Rider petition.

As discussed above, the pending TCR Petition provides voluminous information that meets the Commission's requirements and is sufficient to inform the Commission's cost recovery decision, and we are unaware of any contested factual issues that need resolution. The costs in question relate to grid modernization projects that have previously been certified as eligible for recovery through the TCR Rider. If a party would like specific additional information, we would be happy to provide it, and in fact we have been doing so in response to Information Requests in this docket, which is a typical part of the standard procedural process. Given the amount of information already provided, as well the opportunity for parties to request additional specific information under the general miscellaneous filing process, bifurcating the proceeding and potentially creating a separate set of requirements or review standards is not necessary, and doing so would only add more time to an already lengthy process. We outline the impacts of further delay to customers and the Company below.

C. Bifurcation Causes Logistical Problems

We are concerned about the logistical implications of bifurcating AMI and FAN from the other costs contained in our Petition – and at the same time, we are concerned about unduly slowing down consideration and recovery of the other costs that were not contemplated to be subject to potential additional process. There could be wide-ranging impacts, some of which may be unknown or unintended, if cost recovery decisions in this case are bifurcated. As discussed in Parts A and B above, we are

concerned that additional delays in this proceeding would delay the process and procedure for separate treatment and implementation of AMI and FAN and the non-AGIS costs. Any further delay, in turn, has impacts on rider revenue requirements and customers' rates.

For example, a significant delay in assessment and approval of our 2020 and 2021 AMI and FAN investments could create revenue recognition issues under GAAP accounting rules, which specify that revenues must be collected within 24 months following the end of the annual period in which they are recognized. Since some of the costs eligible for recovery in this proceeding date back to 2020 when the Commission certified the investments, an additional delay in this proceeding could cause accounting challenges if new rates are not implemented by the end of 2022. Furthermore, the costs presented in this proceeding align with the costs presented in the pending rate case in Docket No. E002/GR-21-630, in addition to aligning with how the investments are presented in other related open dockets such as Docket No. E999/DI-20-627 (Metrics, Reporting, and Consumer Protections), Docket No. E002/M-20-680 (Procedural Paths Forward), E002/M-21-694 (2021 IDP). It is uncertain whether a delay in the TCR proceeding could impact these dockets or vice versa.

In addition, if the proceeding is bifurcated and a transmission component, for example, is approved while other costs are reviewed, that could create challenges and customer confusion with implementing TCR adjustment factors that would be subject to further revision following the approval of another component, such as ADMS or LoadSEER – particularly since both transmission and grid modernization investments are to be recovered in one rider. There does not seem to be precedent for review and approval of only part of a rate proposal under a single Rider while other costs continue to be vetted. Unwinding different cost types intended to be included in one TCR rate in the middle of the proceeding would likely prove challenging, especially in this case because ADMS costs have previously been approved for recovery under the TCR Rider.

As we have noted, we need a cost recovery decision in this docket for at least 2020-2021 AMI and FAN revenue requirements before December 31, 2022. Since the Company cannot identify any significant benefits for bifurcating this proceeding, and instead has concerns that bifurcation will cause delays and create additional complexity not only in this proceeding but in various other open dockets, we believe that the proceeding should proceed under the current procedural process, with an extended comment and reply period, for all investments proposed for recovery through the rider.

D. Bifurcation Creates Myriad Procedural Issues

As discussed throughout these Comments, we do not believe a separate process is needed to address additional procedural or scoping decisions, as was indicated in the Commission's July 23, 2020 Order, and creating a separate process would result in procedural and other issues. While it may have been the Commission's initial intent to make a separate decision on scoping and procedures for AMI and FAN, given the passage of time and the extensive stakeholder engagement and project information that has been developed and filed since then, that Order Point may be less relevant today than when initially issued.

III. THE DEPARTMENT'S GUIDANCE DOCUMENT SHOULD NOT BE APPLIED TO CURRENT AGIS OR GRID MODERNIZATION INVESTMENTS

On February 9, 2022, the Department filed, in this proceeding, a Guidance Document entitled *Review and Assessment of Grid Modernization Plans, Guidance for Utilities, Regulators, and other Stakeholders*, prepared by Synapse Energy Economics, Inc. The Guidance Document includes significant and sweeping additional requirements and standards for review of utility investments.

According to the Department, the Guidance Document applies to our current request for recovery of grid modernization costs in the TCR Rider. Separately, the Department applied the Guidance Document to our certification requests for other grid modernization investments in our 2021 IDP in Docket No. E002/M-21-694 – and states it intends to apply it to all future utility grid modernization proposals, regardless of whether the Commission adopts it.¹³ As stated by the Department:

It is the Department's intention to evaluate utility grid modernization proposals based on the prescriptions of the Guidance Document and will do so absent Commission action.

Nevertheless, the Department recommends that the Commission require utility grid modernization proposals to adhere to the filing requirements, methods of evaluation, and ratepayer projections detailed in the Guidance Document.¹⁴

While the Department is, of course, free to assess utilities' grid modernization filings in whatever way it deems appropriate, its adoption of broad standards that go beyond those established by the Commission and that are applicable to all utilities is concerning. Its statement that it will apply its own standards "absent Commission

¹³ Department Comments at pages 3-5 (February 9, 2022).

¹⁴ *Id* at page 10.

action” simply ignores that the Commission has repeatedly taken applicable action and established applicable standards.

If the Department believes the standards the Commission has adopted are insufficient, then it should pursue a procedural process where parties have an opportunity to comment, and the Commission has an opportunity to consider the entirety of a record that is developed. We have numerous concerns regarding with the Department’s unilateral application of its Guidance Document; these concerns are discussed in greater detail below.

A. The Department’s Purported Application of the Guidance Document to This Proceeding Creates Process Deficiencies

The Department’s proposal presents potentially concerning process issues. While the Department states that it intends to evaluate all grid modernization proposals using the Guidance Document issued six weeks ago, no party, nor even the Commission, has had the opportunity to comment on its findings and recommendations. Indeed, the Department proposed that the Company be held to this voluminous new set of requirements and standards in the midst of ongoing proceedings, notwithstanding the existing comprehensive procedural and informational requirements for the projects currently under review.

The Department’s February 2022 Guidance Document is untimely in that it was filed over 15 months after the deadline the Commission established in its July 23, 2020 Order in Docket No. E002/M-19-666. While the Department is free to modify its recommendations on the proper methodologies to evaluate grid modernization investments, those modifications cannot be used to retroactively evaluate our grid modernization investments. We welcome the opportunity to further discuss our distribution planning, grid modernization projects, and cost recovery proposals with the Commission and stakeholders, but changes to the process and the criteria by which the Commission evaluates our grid modernization projects must be made on a prospective basis after a full record has been developed through a robust opportunity for stakeholders to engage on the proposed changes. This is especially true given that the Commission already has adopted a framework for assessing grid modernization proposals, which the Department’s Guidance Document, if adopted, would substantially revise.

As discussed throughout these Comments and as shown in Attachments A and B, the Company has undertaken significant efforts to comply with all of the previously established requirements, including extensive record development of metrics and performance evaluation methods. If applied, the Department’s Guidance Document

would effectively reset the standards and requirements in the middle of a proceeding, with no clear path for satisfying the significant proposed changes. The Commission should not hold utilities to the significant additional requirements the Department has unilaterally adopted.

To the extent the Commission wishes to adopt new or additional requirements or establish a prescriptive framework for evaluating grid modernization investments, significant, additional process is necessary. The Commission should provide the opportunity for interested parties to engage, comment, share perspectives, and identify concerns and impacts in a generally-applicable docket – and any changes to existing requirements must be applied *prospectively*. That would be consistent with past Commission practice and consistent with the public interest – and as such, the Commission should not deviate from that practice. As discussed in our March 22, 2022 Reply Comments our 2021 IDP, we would be happy to participate in such an effort and to help develop any forward-looking guidance on these important topics, which will affect not only our grid modernization cost recovery requests, but also the IDP process overall.

B. The Department’s Retroactive Application of the Guidance Document Raises Policy Concerns

In addition to the process issues, we have significant concerns about the Guidance Document from a policy perspective, and the potential impacts if adopted. The Department sets the stage for the Guidance Document saying that grid modernization investments are a novel and emergent phenomenon in utility distribution systems, and as such, demand extraordinary consideration and evaluation in order to protect the interests of customers and to promote the public interest. Further, its cost-benefit framework is intended to mimic a Certificate of Need proceeding that is an outcome of an Integrated Resource Plan (IRP). This goes well beyond the Legislature’s and Commission’s current requirements for grid modernization, the established procedural framework, and the Commission’s prior stated opinion it expressed in its 2016 order certifying ADMS, indicating that the Commission:

...continues to hold...that it is most appropriate to apply the statute on a case-by-case basis and to develop more detailed criteria, if necessary, over time, as the Commission gains further experience with grid modernization.¹⁵

There is not a similar statutory framework for grid modernization as there is for bulk system resources – nor has the Commission chosen to undertake a Rulemaking to establish a similar procedural web. We outlined and discussed our concerns with

¹⁵ See Order in Docket No. E002/M-19-666 at page 12 (July 23, 2020).

indiscriminate adoption of the Department's Guidance Document without thorough review and input from interested parties and the Commission in our March 22, 2022 IDP Reply Comments in Docket No. E002/M-21-694. We incorporate those comments by reference, and so do not repeat those arguments here.

We repeat however, if the Commission desires a standardized, prescriptive evaluation of distribution or grid modernization investments, that should play out through significant stakeholder engagement and a proceeding that examines the appropriate framework to use, the appropriate assumptions and inputs for utilities to make based on the type of investment, and prospective implementation. The Commission has previously recognized this, and for example, examined and adopted parameters and a range of environmental values associated with each method of electricity generation that utilities must use when evaluating and selecting resource options in all proceedings before the Commission, including IRP and certificate of need proceedings.¹⁶ The Commission is also currently acting pursuant to Minn. Stat. § 216B.2428 (part of the Natural Gas Innovation Act) to develop, among other things, frameworks for lifecycle greenhouse gas emissions intensity accounting and cost-benefit accounting for comparing innovative resources, and to measure cost-effectiveness of innovative resources and overall Innovation Plans for a regulated natural gas utility.¹⁷ The Department is currently in the midst of a process to update the framework for evaluating the cost-effectiveness of Minnesota's Conservation Improvement Programs. Before adopting the type of evaluation and cost-benefit analysis that the Department's Guidance Document assumes is the only way to appropriately evaluate grid modernization (and other distribution) investments, there needs to be a similar effort undertaken to develop a proper framework for utilities and all parties to follow.

While reasonable and meaningful standards should certainly be required, setting unattainable, overly-broad, overly-prescriptive, or non-applicable standards will consume valuable resources – and could have other unintended negative consequences. This could be particularly problematic at a time when the Commission is encouraging grid modernization efforts and innovation and the Company is in the midst of implementing and gaining experience with these technologies. Standards and filing requirements should also be considered in light of Minnesota statutes, which have recognized the importance of grid modernization to the state, and have provided a regulatory path for timely recovery of costs associated with grid modernization investments. We believe there should be proper and thoughtful balance to ensure

¹⁶ See ORDER UPDATING ENVIRONMENTAL COST VALUES in Docket No. E999/CI-14-643 (January 3, 2018).

¹⁷ See NOTICE OF COMMENT PERIOD in Docket No. G999/CI-21-566 (December 8, 2021).

provision of robust information, but the objectives, reasonableness, and resources necessary to comply with the Department's recommendation must also be considered.

CONCLUSION

We recognize grid modernization technologies and implementation are novel in Minnesota, but Minnesota has well-established procedural processes to examine utility investments that it has been using for many years. These processes have facilitated the Commission's cost recovery decisions related to transmission investments and renewable energy investments where costs are also recovered under rate riders. There is no need to bifurcate AGIS from the other investments contained in our TCR Petition. Subjecting grid modernization investments to a newly introduced set of requirements or diverting them to an uncertain cost recovery path may result in service impacts to customers and is not in the public interest. We have relied in good faith on the Commission's certification decision and complied with all requirements. The Commission and parties have all of the information necessary to evaluate our cost recovery request and it should proceed on a standard rider recovery procedural path that leads to a Commission determination prior to the end of 2022.

Dated: March 30, 2022

Northern States Power Company

Northern States Power Company
2021-2022 Transmission Cost Recovery (TCR) Rider
Grid Modernization Procedural History

Docket Nos. E002/M-21-814 and E002/M-20-680
 March 30, 2022 Comments
 Attachment A – Page 1 of 3

Date	Docket No.	Relevant Order Points, Outcomes, Actions
10/30/2015	E002/M-15-962	The Company's first Distribution Grid Modernization Report proposed ADMS for certification.
06/28/2016	E002/M-15-962	Commission Order certified ADMS (Order Point 1).
11/01/2017	E002/M-17-775	The Company proposed a residential time of use (TOU) pilot program.
	E002/M-17-776	The Company's 2017 Biennial Distribution Grid Modernization Report proposed the TOU Pilot for certification.
08/07/2018	E002/M-17-775 and E002/M-17-776	Commission Order certified the TOU Pilot (Order Point 1).
11/08/2017	E002/M-17-797	ADMS first proposed for cost recovery in the TCR Rider. Cost recovery for 2018 approved in 2019 (see below).
08/30/2018	E002/CI-18-251	Commission Order established filing requirements for Xcel Energy's IDP and required at least one stakeholder meeting prior to filing (Order Point 1 and attachment).
11/01/2018	E002/CI-18-251	Xcel Energy submitted its first IDP (2018 IDP). The 2018 IDP laid out the Company's plans for AMI and FAN implementation. The Company subsequently requested certification of AMI and FAN projects in the 2019 IDP (see below).
12/12/2018	E002/CI-18-251	Xcel Energy stakeholder workshop, provided an overview of the Company's 2018 IDP and facilitated a Q&A forum with stakeholders.
04/10/2019	E002/CI-18-251	Xcel Energy's stakeholder engagement in advance of 2019 IDP: Stakeholder Meeting #1 addressed non-wires alternatives analysis.
05/17/2019	E002/CI-18-251	Xcel Energy's stakeholder engagement in advance of 2019 IDP: Stakeholder Meeting #2 addressed the cost-benefit framework for advanced grid investments.
07/16/2019	E002/CI-18-251	Commission Order accepting 2018 IDP, also amending filing requirements for future IDPs (Order Points 3-11).
09/25/2019	E002/CI-18-251	Xcel Energy's stakeholder engagement in advance of 2019 IDP: Stakeholder Meeting #3 presented the load and DER forecasts, investment plans including certification requests for AMI and FAN, and five-year action plan to be included in the 2019 IDP.
09/27/2019	E002/M-17-797	Commission Order on 2019 TCR Petition: <ul style="list-style-type: none"> • Approved recovery of ADMS costs under the TCR Rider, required ADMS annual reporting, and established filing requirements for future ADMS cost recovery requests (Order Points 1, 6, and 7). • Established extensive filing requirements for future AGIS-related cost recovery requests (Order Point 9).

Date	Docket No.	Relevant Order Points, Outcomes, Actions
11/01/2019	E002/M-19-666	Xcel Energy's 2019 IDP: <ul style="list-style-type: none"> The Company requested certification of AMI and FAN and other grid modernization investments (FLISR, IVVO, APT (LoadSEER)), providing information in compliance with all IDP requirements as well as the <i>cost recovery</i> requirements established by the Commission in Docket No. E002/M-17-797. Also included Direct Testimony from the Company's General Rate Case, filed in parallel with the 2019 IDP in Docket No. E002/GR-19-564 regarding the proposed grid modernization investments (see below).
11/01/2019	E002/GR-19-564	Xcel Energy General Rate Case with a three-year plan that includes cost recovery for much, but not all, of the grid modernization investments included in parallel in the 2019 IDP. This case was later formally withdrawn (April 7, 2020).
11/15/2019	E002/M-19-721	Xcel Energy TCR Rider Petition that requested recovery of ADMS for 2019 and 2020 revenue requirements, in addition to eligible transmission projects. Cost recovery approved in 2021 (see below).
07/23/2020	E002/M-19-666	Commission Order on 2019 IDP: <ul style="list-style-type: none"> Granted certification of AMI and FAN and established additional reporting requirements for AMI and FAN cost recovery proposals (Order Points 7 and 8). Established additional reporting for all future grid modernization cost recovery proposals (Order Point 10). Required the Department to file a report by November 1, 2020 to include recommendations on metrics, performance evaluation, and consumer protections for AMI and FAN to be informed by a stakeholder process (<i>see Docket No. E999/DI-20-627</i>) (Order Point 9).¹ Clarifies certification will permit the Company to request rider recovery in the future, which the Commission may approve or deny based on the facts available at that time. Required Xcel Energy to file preferred procedural paths forward 60 days prior to a petition to seek rider recovery of certified AMI and FAN costs. The Commission indicated it would make a procedural and scoping decision prior to the consideration of a rider recovery determination related to AMI and FAN (<i>see Docket No. E002/M-20-680</i>) (Order Points 11 and 13). Certified APT and established a cost cap (Order Point 14).
08/20/2020	E999/DI-20-627	The Department issued its initial notice of solicitation of stakeholder input and comments on Metrics, Performance, and Consumer Protections to be applied to Xcel Energy's AMI and FAN Projects.
08/28/2020	E002/M-20-680	Xcel Energy made its compliance filing on Procedural Paths Forward for AMI and FAN, the certified AGIS projects.

¹ The November 1, 2020 due date for this Report was later extended by the Commission to December 1, 2020 in its October 20, 2020 Order in Docket Nos. E002/M-19-666 and E002/M-20-680.

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Grid Modernization Procedural History

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Date	Docket No.	Relevant Order Points, Outcomes, Actions
09/18/2020 - 10/16/2020	E999/DI-20-627	Initial comments from parties on Metrics, Performance, and Consumer Protections for AMI and FAN.
10/14/2020 - 10/16/2020	E002/M-20-680	Parties filed initial comments on Xcel Energy's Procedural Paths Forward for AMI and FAN. ²
10/23/2020	E999/DI-20-627	Department stakeholder workshop on in its Metrics, Performance, and Consumer Protections for AMI and FAN proceeding. Xcel Energy's presentation as directed by the Department addressed topics including the following: <ul style="list-style-type: none"> • AMI and FAN implementation plans, infrastructure details, functionality and capabilities, and potential future uses; • AMI and FAN financials, including cost-benefit analysis framework; and • Customer and stakeholder engagement roadmap.
10/30/2020	E002/M-20-680	Xcel Energy filed reply comments on Procedural Paths Forward for the AMI and FAN projects.
11/20/2020	E999/DI-20-627	Xcel Energy follow-up stakeholder workshop on customer program plans for AMI and FAN, due to significant interest at first workshop.
12/01/2020 ³	E999/DI-20-627	The Department filed its Report on Methods for AMI and FAN Performance Evaluations, Metrics, and Customer Protections for AMI and FAN.
11/01/2021	E002/M-21-694	Xcel Energy IDP filed, seeking certification of Distributed Intelligence and a Resilient Minneapolis Project.
11/24/2021	E002/M-21-814	Xcel Energy TCR Petition filed, seeking 2020-2022 cost recovery of certain transmission projects and certified grid modernization projects: ADMS, AMI, FAN, LoadSEER, and the TOU Pilot.
12/10/2021	E002/M-19-721	Commission Order approving recovery of ADMS costs for 2019 and 2020 in the TCR Rider (Order Point 9).
02/09/2022	E002/M-21-814	Department Letter filed in the Company's 2021 TCR proceeding introducing the Department's Guidance Document, ⁴ stating its purpose is to distill the Commission's Orders into filing requirements for all utility grid modernization proposals, describe best practices for conducting economic evaluations of grid modernization investments, and intended to complement and incorporate the Department's December 1, 2020 Report on Methods for AMI and FAN Performance Evaluations, Metrics, and Customer Protections for AMI and FAN. Finally, it is intended to be generally applicable to any utility grid modernization proposal.

² Xcel Large Industrial's comments were combined with a Motion to consolidate various AGIS-related dockets into the Company's 2020 rate case. The Commission denied the Motion in its January 26, 2021 Order.

³ The Commission granted an extension to December 1, 2020 for the report filing date.

⁴ The Department's Guidance Document is entitled *Review and Assessment of Grid Modernization Plans: Guidance for Regulators, Utilities, and Other Stakeholders* (Guidance Document).

Northern States Power Company
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Compliance Checklist

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Order Point	September 27, 2019 Order in Docket No. E002/M-17-797	Location in 2021 TCR Rider Petition
6	Xcel must include in any future cost recovery filing for ADMS investments an ADMS business case and a comprehensive assessment of qualitative and quantitative benefits to customers.	Attachment 2
7	Xcel must make an annual ADMS filing that includes: a. The actual costs spent on the ADMS implementation for the reporting period, and for the work to date, broken down in the categories of: design (including software configuration and software interfaces), hardware, software, testing and implementation – broken down by internal and external labor. b. An estimate of the total quantity of work completed on the ADMS Project identified by major category. In the event work cannot be quantified, major tasks completed shall be provided. c. The additional functional requirements installed to achieve ADMS usage functions (including AMI, FAN, FLISR or IVVO modules), their percent of system implementation or integration, and cost incurred to date. d. The estimated anticipated expenses in coming reporting periods, both capital and O&M.	NA in TCR Petition. ADMS annual reports filed separately on January 24, 2020, January 25, 2021, and January 25, 2022.
9	If and when Xcel requests cost recovery for Advanced Grid Intelligence and Security investments, the filing must include a business case and comprehensive assessment of qualitative and quantitative benefits to customers, considering, at a minimum, the following: A. Scope of Investment 1. Investment Description	-----
	a. Detailed description of proposed investment and project life; and	Attachment 4 throughout.
	b. If multiple components, overview of costs and descriptions of each:	Attachment 4 throughout.
	i. Include purpose and role;	AMI - Attachment 4, Sections I, II, III FAN - Attachment 4, Sections I, II, IV
	ii. Explain known and potential future use cases for each component;	AMI - Attachment 4, Sections I, II, III FAN - Attachment 4, Sections I, II, IV
	iii. Explain known and potential value streams and how each component fits with state policy, statutes, rules and Commission orders; and	Petition and Attachment 4 throughout.
	iv. Describe beneficiaries of each investment (who, how many, over what time period).	Attachment 4 throughout.
	c. Articulation of principles, objectives, capability, functionalities, and technologies enabled by investment; and	AMI - Attachment 4, Sections I, II, III FAN - Attachment 4, Sections I, II, IV

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Order Point	September 27, 2019 Order in Docket No. E002/M-17-797	Location in 2021 TCR Rider Petition
	d. Interrelation and interdependencies with other existing or future investments, including overlapping costs: scope, amount, timing.	Attachment 4 throughout.
	2. Alternatives considered: a. If a Request for Proposal was used provide:	----
	i. The RFP issued, including list of all services or assets scoped in the RFP;	AMI – Attachment 4, Section III(B) and Attachment 4B FAN – Attachment 4, Section IV(D) and Attachment 4E
	ii. Provide summary of responses;	AMI – Attachment 4, Section III(B) and Attachments 4C and 4D FAN – Attachment 4, Section IV(D) and Attachment 4F
	iii. Provide assessment of bids and factors used for selection; and	AMI – Attachment 4, Section III(B) and Attachments 4C and 4D FAN – Attachment 4, Section IV(D) and Attachment 4F
	iv. The scope of offerings or services included in the selected bid.	AMI – Attachment 4, Section III(B) and Attachments 4C and 4D FAN – Attachment 4, Section IV(D) and Attachment 4F
	b. If not, what was used.	NA
	3. Costs	----
	a. Provide sufficient information to determine what is included in the investment in each of the following categories:	----
	i. Direct Costs (product, service, customer, project, or activity);	Attachment 4, Section VII and Attachment 4A (CBA)
	ii. Indirect Costs;	Attachment 4, Section VII and Attachment 4A (CBA)
	iii. Tangible Costs;	Attachment 4, Section VII and Attachment 4A (CBA)
	iv. Intangible Costs; and	Attachment 4, Section VII and Attachment 4A (CBA)

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Order Point	September 27, 2019 Order in Docket No. E002/M-17-797	Location in 2021 TCR Rider Petition
	v. Real Costs.	Attachment 4, Section VII and Attachment 4A (CBA)
	b. If needed, provide the utility's definition of each category and whether internal or external labor costs are included in the category and the instant petition. If the costs are not included in the petition, include information on where and when those costs will be sought to be recovered.	Attachment 4, Section VII
	c. If there is overlap or costs included in both categories, outline the overlapping costs and explain.	See item b above.
	d. For each of the cost categories outline whether the investment has been partially approved or included in a previous or on-going docket riders, rate cases, or other cost recovery mechanism or note all costs are included in the instant petition.	Petition
	4. Detailed Analysis of the type of proposed (or multiple) cost effectiveness analysis utilized:	----
	a. Least-cost, best-fit (Xcel proposes in IDP Reply comments);	NA
	b. Utility Cost-test; and	Attachment 4, Section VII and Attachment 4A (CBA)
	c. Integrated Power System and Societal Cost test.	NA
	B. Provide a cost benefit analysis for: 1) each investment component with overlapping costs or benefits in isolation and 2) each bundled components, as appropriate:	Attachment 4, Section IX and Attachment 4A (CBA) Attachment 4, Section IX discusses why there is no separate CBA for FAN.
	1. Provide Discount Rate Used and Basis; and	Attachment 4A (CBA)
	2. Identify cost categories and benefit categories used (explain metrics), including an explanation of how benefits can be monitored over time and proposal for reporting to Commission:	Attachment 4, Section XI addresses metrics and reporting.
	a. Identify quantitative costs and qualitative costs:	Attachment 4, Section VII
	i. Use quantitative methods to address qualitative benefits to the extent possible;	NA
	ii. Explain system used to assess value and priorities to qualitative benefits (points and/or weighting); and	NA
	iii. Identify sensitivity ranges on estimates or value.	NA
	b. Include a long-term bill impact analysis;	Attachment 4, Section VIII

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Order Point	September 27, 2019 Order in Docket No. E002/M-17-797	Location in 2021 TCR Rider Petition
	c. Include a reference case/scenario without the project (or group of projects); and	Attachment 4, Section IX(C)(4) and Attachment 4A (CBA) – reference case uses alternative AMR meter system
	d. Apply the following principles to ensure the investment analysis has:	The Company has incorporated these principles throughout its analysis, including:
	i. compared with traditional resources or technologies;	Attachment 4, Section IX and Attachment 4A (CBA)
	ii. clearly accounted for state regulatory and policy goals;	Petition and Attachment 4 throughout.
	iii. accounted for all relevant costs and benefits, including those difficult to quantify;	Attachment 4, Sections VII, IX and Attachment 4A (CBA)
	iv. provided symmetry across relevant costs and benefits;	Attachment 4, Sections VII and IX
	v. applied a full life-cycle analysis;	Attachment 4, Section IX and Attachment 4A (CBA)
	vi. provided a sufficient incremental and forward-looking view;	Attachment 4, Section IX and Attachment 4A (CBA)
	vii. is transparent;	Petition and Attachment 4 throughout.
	viii. avoided combining or conflating different costs and benefits;	Attachment 4, Section IX and Attachment 4A (CBA)
	ix. discuss customer equity issues, as needed;	Not explicitly addressed but not explicitly required
	x. assessed bundles and portfolio where reasonable; and	Attachment 4 throughout.
	xi. addressed locational and temporal values.	Attachment 4 throughout.

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Order Point	July 23, 2020 Order in Docket No. E002/M-19-666	Location in 2021 TCR Rider Petition
7	The Commission certifies the following components of Xcel's Advanced Grid Intelligence and Security (AGIS) Initiative: a. Advanced Metering Infrastructure (AMI) b. Field Area Network (FAN)	----
8	Certification of the projects in ordering paragraph 7 is made with the recognition, and acceptance from Xcel, that all future cost recovery will be based upon the Company accomplishing Commission-approved metrics and performance evaluations for the certified projects. Any future proposals for cost recovery of investments certified in this Order must be accompanied by a proposal for specific metrics and evaluation methods, and a detailed plan describing how the company will maximize the benefits of the AGIS investments for ratepayers.	Attachment 4, Section XI
10a	When Xcel makes any future cost recovery proposal, in addition to requirements from previous orders, it must include: a. a discussion of mechanisms that will be employed to maximize cost reductions and minimize cost increases, and	Attachment 4, Section V
10b	b. a demonstration that the utility has thoroughly considered the feasibility, costs, and benefits of alternatives, and that the proposed approach is preferable to alternatives. In discussing the alternatives, Xcel should compare different types of the same technology, for example, by comparing different AMI meters.	AMI – Attachment 4, Section III(B) FAN – Attachment 4, Section IV(D)
13	60 days prior to a petition to seek rider recovery for AGIS costs, Xcel Energy shall file preferred procedural paths forward with one option being a contested case. The Commission will make a procedural and scoping decision prior to the consideration of a rider recovery determination. The Executive Secretary is authorized to establish a comment and reply schedule prior to the procedural and scoping hearing.	NA in TCR Petition. Required filing submitted August 28, 2020.
14	The Commission certifies the Advanced Planning Tool and limits cost recovery to a cost cap of \$4 million unless Xcel can show by clear and convincing evidence that the costs were reasonable, prudent, and beyond their control. This certification 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 APT.	Attachment 5 (LoadSEER details). Cost cap recognized, not exceeded.

CERTIFICATE OF SERVICE

I, Crystal Syvertsen, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped
with postage paid in the United States mail at Minneapolis, Minnesota

xx electronic filing

Docket Nos. E002/M-21-814
E002/M-20-680

Dated this 30th day of March 2022

/s/

Crystal Syvertsen
Regulatory Administrator

[illegible]

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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