



**CITIZENS UTILITY BOARD**  
Empowering Minnesota Consumers

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October 17, 2022

Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 250  
St. Paul, MN 55101

**VIA E-FILING**

**Re:**

**In the Matter of Northern States Power  
Company d/b/a Xcel Energy's Petition  
for Approval of the Transmission Cost  
Recovery Rider Requirements for 2021-  
2022, and the Resulting Adjustment  
Factors by Customer Class**

**Docket Nos. E-002/M-21-814  
E-002/M-20-680**

Dear Mr. Seuffert:

Enclosed and e-filed in MPUC Dockets Nos. E-002/M-21-814 and E-002/M-20-680, please find the Initial Comments of the Citizens Utility Board of Minnesota in the above-referenced matter.

Sincerely,

/s/ Brandon Crawford  
Brandon Crawford  
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cc: Service Lists

**State of Minnesota  
Before the Public Utilities Commission**

Katie Sieben	Chair
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
Joseph Sullivan	Commissioner
John Tuma	Commissioner

In the Matter of Northern States Power  
Company d/b/a Xcel Energy's Petition for  
Approval of the Transmission Cost Recovery  
Rider Requirements for 2021-2022, and the  
Resulting Adjustment Factors by Customer  
Class

Dockets Nos. E-002/M-21-814  
E-002/M-20-680

**Initial Comments of the Citizens Utility Board of Minnesota**

The Citizens Utility Board of Minnesota ("CUB") respectfully submits these comments regarding Xcel Energy's (the "Company") Petition for Approval of the Transmission Cost Recovery Rider Revenue Requirements for 2021-2022 in Minnesota Public Utilities Commission ("Commission") Dockets Nos. E-002/M-21-814 and E-002/M-20-680. CUB recommends that a combination of cost recovery caps and benefit assurances be required as part of the Company's Advanced Metering Infrastructure ("AMI") and Field Area Network ("FAN") projects. When paired with comprehensive reporting requirements for identified metrics, these requirements can help ensure customer benefits are realized and cost overruns avoided.

**I. Background**

On July 23, 2020, the Commission accepted the Company's 2019 Integrated Distribution Plan and certified its AMI and FAN grid modernization projects in accordance with Minn. Stat. § 216B.2425.<sup>1</sup> As part of that Order, the Commission required the Department of Commerce (the "Department") to file a report "including recommendations on specific metrics, detailed methods for evaluating performance, and consumer protections and other conditions, including cost caps, that should be applied to the certified [AMI and FAN] projects."<sup>2</sup> The Commission likewise clarified that, despite its certification of AMI and FAN, "all future cost recovery [would] be based upon the Company accomplishing Commission-approved metrics and performance evaluations."<sup>3</sup> Whether costs would ultimately be recovered through the Transmission Cost Recovery ("TCR") Rider or traditional

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<sup>1</sup> *In the Matter of Xcel Energy's Integrated Distribution Plan and Advanced Grid Intelligence and Security Certification Request*, Docket No. E-002/M-19-666, Order Accepting Integrated Distribution Plan, Modifying Reporting Requirements, and Certifying Certain Grid Modernization Projects (July 23, 2020) (hereinafter "Commission Order Certifying AMI and FAN").

<sup>2</sup> *Id.* at 16.

<sup>3</sup> *Id.*

ratemaking procedures was left undecided by the Commission, which stated: “the Commission clarifies that it is not pre-judging whether costs will be recovered through riders or base rates. Certification will permit Xcel to request rider recovery in the future, which the Commission may approve or deny based on the facts available at that time.”<sup>4</sup>

Consistent with the Commission’s Order, the Department initiated a stakeholder engagement process to inform its development of proposed metrics and standards. CUB submitted comments in response to the Department’s solicitation of input.<sup>5</sup> On December 1, 2020, the Department filed its Report on Methods for Performance Evaluations, Metrics, and Consumer Protections for AMI and FAN in Dockets Nos. E002/M-19-666 and E999/DI-20-627 (the “Department’s Report”).<sup>6</sup>

On November 24, 2021, the Company filed its Petition for Approval of the Transmission Cost Recovery Rider Revenue Requirements for 2021-2022, and the Resulting Adjustment Factors by Customer Class in Docket No. E002/M-21-814.<sup>7</sup> Included in the requested recovery were the Advanced Grid Intelligence and Security (“AGIS”) costs associated with AMI and FAN that the Commission had certified in Docket No. E002/M-19-666. The Commission initiated a comment period and sought input on the Company’s Petition, as well as what procedural path was most appropriate for addressing cost recovery. CUB, along with the Department, recommended that a bifurcated process be adopted to distinguish between AGIS and non-AGIS costs, with AGIS-related costs being referred to the Office of Administrative Hearings for a contested case.<sup>8</sup> In contrast, the Company recommended a traditional comment and reply process be followed.

Subsequently, discussions between the Department and the Company resulted in a proposed procedural pathway agreement. The agreement, which was confirmed by Commission Order on June 2, 2022, allowed the TCR Petition to stay in its current docket but required additional comprehensive

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<sup>4</sup> *Id.* at 17, Commission Order Point 11.

<sup>5</sup> *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*, Docket No. E999/DI-20-627, Comments of the Citizens Utility Board of Minnesota (Oct. 16, 2020) (hereinafter “CUB October 16 Comments in Docket No. E999/DI-20-627”).

<sup>6</sup> *In the Matter of Xcel Energy’s Integrated Distribution Plan and Advanced Grid Intelligence and Security Certification Request*, Dockets Nos. E002/M-19-666; E999/DI-20-627, Report of the Minnesota Commerce Department on Methods for Performance Evaluations, Metrics, and Consumer Protections for AMI and FAN (Dec. 1, 2020) (hereinafter “Department Report”).

<sup>7</sup> *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*, Docket No. E002/M-21-814, Xcel Initial Petition and Compliance Filing (Nov. 24, 2021) (hereinafter “Xcel Initial Petition”).

<sup>8</sup> *See 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*, Docket No. E002/M-21-814, Comments of the Citizens Utility Board of Minnesota, at 6 (Mar. 30, 2022) (hereinafter “CUB March 30, 2022 Comments in Docket 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*, Docket No. E002/M-21-814, Comments of the Minnesota Department of Commerce, Division of Energy Resources, at 18 (Mar. 30, 2022).

filings to be made by the Company.<sup>9</sup> Notably, while the Department and the Company agreed as to the procedural process for evaluating project recovery, there was no explicit agreement described in the procedural pathway as to whether those costs should be recovered through the TCR rider, and there has been no determination by the Commission on this point. As required by the agreement, Xcel filed a supplemental report detailing the Company's AMI and FAN investments on August 17, 2022 ("Supplemental Filing").<sup>10</sup>

## **II. Overview of Comments**

CUB appreciates the benefits that advanced grid infrastructure can bring to both the Company and its customers. As we have noted previously, grid modernization projects, specifically AMI and FAN, can provide an opportunity to "advance Minnesota's energy goals, support integration of . . . renewables, empower consumers to make their own choices [on energy use], and leverage customer-sited resources to assist grid operation."<sup>11</sup> At the same time, these technologies can help increase the reliability and flexibility of the grid by measuring energy data, identifying power outages, detecting loose connections, and allowing remote disconnection and reconnection of customer energy supplies.<sup>12</sup>

While these potential benefits are numerous, CUB remains cognizant of the significant costs associated with these upgrades. The sheer scale of these investments underscores the need for effective oversight and review to help ensure the investments are cost effective, incurred in a prudent manner, and recovered in a way that minimizes financial harm to ratepayers. The Company's supplemental cost-benefit analysis estimates the projects, together, will cost more than \$560 million.<sup>13</sup> In a November 2021 filing, Xcel also estimated that the AMI and FAN projects would have a monthly cost of \$2.87 for average residential customers in 2024,<sup>14</sup> which represents nearly 4 percent of the average bill for a residential customer with overhead electric service.<sup>15</sup> These costs are in addition to

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<sup>9</sup> *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*, Docket No. E002/M-21-814, Commission Order (June 2, 2022).

<sup>10</sup> *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*, Docket No. E002/M-21-814, Xcel Supplement Filing (Aug. 17, 2022) (hereinafter "Supplemental Filing").

<sup>11</sup> CUB October 16 Comments in Docket No. E999/DI-20-627 at 1.

<sup>12</sup> See, e.g., Supplemental Filing at 24.

<sup>13</sup> Supplemental Filing at 39.

<sup>14</sup> CUB March 30, 2022 Comments in Docket E002/M-21-814 (citing *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 2021-2022, and the Resulting Adjustment Factors by Customer Class*, Docket No. E002/M-21-814, Xcel Initial Petition, Attachment 4, at 57 (Nov. 24, 2021)).

<sup>15</sup> See *In the Matter of the Application of Northern States Power Company for Authority to Increase Rates for Electric Service in the State of Minnesota*, Docket No. E002/GR-21-630, Xcel Interim Rates Compliance Filing, Attach. D (Jan. 3, 2022) (reporting that the average residential bill for a customer with overhead line service is \$77.57 per month).

the requested \$677.3 million<sup>16</sup> increase in annual revenue—and associated 24% residential rate increase<sup>17</sup>—currently being evaluated in the Company’s Multi-Year Rate Plan (“MYRP”).

CUB continues to be of the position that cost recovery for AGIS Initiative investments would be most appropriate through the established ratemaking procedures of the Company’s MYRP<sup>18</sup> or, alternatively, through another contested case proceeding.<sup>19</sup> We continue to believe that “the use of riders undermines a multiyear rate plan’s purpose to provide a cost control incentive and may obscure the true financial impact to customers, diminish the transparent accounting of distribution system costs in rates, and lead to double recovery – all of which are particularly important in the context of a potential bill increase of nearly 4% for an average customer.”<sup>20</sup>

Further, rate case recovery of AMI and FAN costs would be consistent with the Commission directive that utilities seize the “administrative efficiencies” of multiyear rate plans by “recovering continuing, predictable costs” through base rates, rather than riders.<sup>21</sup> As the Company recognized in its Petition, AMI serves the same core function of utility operations that meters have served for years: “measur[ing] the amount of electricity used by . . . customers for billing purposes.”<sup>22</sup> Even though AMI and FAN are new technologies with new capabilities, their deployment involves the type of predictable ongoing expenses that are best addressed through the transparent and administratively efficient processes of the MYRP. Finally, the TCR rider does not provide the same level of oversight or review typical of MYRP proceedings and is not necessary for the recovery of predictable costs that are not “outside the control of the utility.”<sup>23</sup>

The need for additional oversight is exacerbated by the history of utilities, on a national scale, not delivering on their promises of advanced grid modernization benefits. CUB highlighted these concerns in its initial comments in Docket No. E999/DI-20-627—noting that Seattle City Light provided only 70 percent of its promised investments due to cost overruns<sup>24</sup>—and in a report prepared for CUB by Strategen in response Xcel’s 2019 Integrated Distribution Plan, which cited a McKinsey report, stating: “Some utilities have had to interrupt their roll out of smart meters to reassess the technology selected, and some have switched vendors. Still others have incurred hundreds of millions of dollars in cost overruns due to systems integration issues. And some utilities have failed to realize expected benefits

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<sup>16</sup> See, e.g. *In the Matter of Xcel Energy’s Application for Authority to Increase Electric Rates*, Docket No. E002/GR-21-630, Direct Testimony of Greg Chamberlain (Oct. 25, 2021).

<sup>17</sup> Xcel’s MYRP seeks a total retail revenue increase of 21.16% and a residential-specific increase of 24.33% by plan year 2024. See *In the Matter of Xcel Energy’s Application for Authority to Increase Electric Rates*, Docket No. E002/GR-21-630, Direct Testimony of Nicholas Paluck, at 10 (Oct. 25, 2021).

<sup>18</sup> CUB October 16 Comments in Docket No. E999/DI-20-627 at 3.

<sup>19</sup> CUB March 30, 2022 Comments in Docket E002/M-21-814 at 4.

<sup>20</sup> *Id.* at 6.

<sup>21</sup> *In the Matter of the Minnesota Office of the Attorney General – Antitrust and Utilities Division’s Petition for a Commission Investigation Regarding Criteria and Standards for Multiyear Rate Plans under Minn. Stat. § 216B.16, Subd. 19*, Docket No. E,G-999/M-12-587, Order Establishing Terms, Conditions, and Procedures for Multiyear Rate Plans, at 8 (June 17, 2013).

<sup>22</sup> Xcel Initial Petition at Attachment 4, page 11.

<sup>23</sup> CUB October 16 Comments in Docket No. E999/DI-20-627 at 2.

<sup>24</sup> *Id.* at 1.

from smart meter projects because of change-management issues.”<sup>25</sup> More recently, a national study was conducted by Mission:Data that underscores utilities’ systemic failures to provide customers with the promised benefits of AMI. Despite utility promises that AMI meters would provide real-time and interval usage data and energy management tools, the study found that “most of the data access benefits promised to customers have been deactivated.”<sup>26</sup> Of the 17.38 million AMI meters funded by the American Recovery and Reinvestment Act (“ARRA”), 89.7% had “real-time access capabilities,” but only 2.9% had those capabilities enabled.<sup>27</sup> Further, utilities have neglected to provide application programming interfaces (“API”) to allow customers access to promised data and energy management tools.<sup>28</sup> This report serves as an important reminder why strong consumer protections are a necessary element of AMI and FAN deployment.

That said, CUB recognizes that it is likely too late to incorporate AMI and FAN costs into the MYRP proceeding currently underway. Therefore, we reluctantly acknowledge that recovery of these costs through the TCR rider may be necessary in this instance. Still, such recovery is only appropriate if the Commission first implements standards and protections for ensuring an appropriate division of risk, cost, and benefits. Further, CUB strongly recommends that these types of projects be reviewed through traditional rate case proceedings and not be eligible for inclusion in the TCR rider in the future.

Although our views towards the AMI and FAN projects have not significantly changed since our initial comments in Dockets Nos. E999/DI-20-627 and E002/M-21-814, we have outlined them again below. The protections, metrics, and performance evaluations CUB previously supported are even more necessary now that the Petition is proceeding through the traditional notice-and-comment process (rather than through a contested case).

Further, as stated above, the Commission previously ordered that “future cost recovery [for Commission-certified AGIS projects] will be based upon the Company accomplishing Commission-approved metrics and performance evaluations for the certified projects.”<sup>29</sup> It is our understanding that the Commission has not yet approved a set of metrics and performance evaluations for the certified projects. Because the Commission conditioned cost recovery on the accomplishment of these metrics in its prior Order, it should once again make clear that the Company bears the burden of proving satisfactory performance, regardless of whether cost recovery begins prior to the reporting of metrics. As detailed more fully below, CUB recommends that the Commission protect consumers by establishing cost caps and revenue sharing mechanisms, requiring comprehensive project

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<sup>25</sup> *In the Matter of Xcel Energy’s Integrated Distribution Plan and Advanced Grid Intelligence and Security Certification Request*, Docket No. E002/M-19-666, Strategen’s REVIEW AND RECOMMENDATIONS FOR THE XCEL ENERGY INTEGRATED DISTRIBUTION PLAN, at 11 (Mar. 17, 2020) (citing Anjan Asthana, Adrian Booth, and Jason Green, BEST PRACTICES IN THE DEPLOYMENT OF SMART GRID TECHNOLOGIES, MCKINSEY & CO. (Summer 2010).

<sup>26</sup> MISSION:DATA, DEACTIVATED: HOW ELECTRIC UTILITIES TURNED OFF THE DATA-SHARING FEATURES OF 14 MILLION SMART METERS, at 3 (Sep. 2022).

<sup>27</sup> *Id.*

<sup>28</sup> *Id.*

<sup>29</sup> Commission Order Certifying AMI and FAN at 16.

reporting on a wide variety of metrics, and taking such other actions as are necessary to ensure the promised benefits of advanced grid modernization are realized.

### III. Cost Caps and Revenue Sharing

As discussed above, grid modernization projects are “inherently complex” and are often “subject to cost overruns.”<sup>30</sup> Because the Company’s AMI and FAN project costs could similarly exceed budgeted amounts, cost recovery caps should be established.<sup>31</sup> The Department<sup>32</sup> and OAG<sup>33</sup> both agree with this approach, while the Company suggests that cost recovery caps are “less useful” for “dynamic” grid modernization projects dealing with developing technologies.<sup>34</sup> As the Department articulated in its Report, however, the “type, scope, and nascent nature” of AMI and FAN render cost caps reasonable for the exact same reasons that Xcel argues they should not apply.<sup>35</sup>

CUB continues to believe that cost recovery caps are necessary consumer protections that help to balance the risks faced by the Company, its shareholders, and customers. In earlier comments, we proposed fixed and variable cost recovery caps similar to those required by the Hawaii Public Utilities Commission in its approval of investments by the Hawaiian Electric Companies.<sup>36</sup>

*Fixed Cost Recovery.* The Commission should implement fixed cost recovery caps for the AGIS projects. For the AMI and FAN projects, in particular, the Company should recover no more than the lower of actual incurred costs or their proposed costs in the IDP filing, including both capital expense and any proposed deferred expense, as applicable.

*Variable Cost Recovery.* The Commission should also implement variable cost recovery caps, including O&M and labor costs, for the AMI and FAN projects that result in a per-meter cap on cost recovery. For the AMI and FAN projects, the Companies should

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<sup>30</sup> CUB October 16 Comments in Docket No. E999/DI-20-627 at 1.

<sup>31</sup> As CUB recognized in its October 16, 2020 Comments in Docket No. E999/DI-20-627, a cost overrun of 14% for Xcel’s AMI and FAN projects would amount to approximately \$67 million in additional costs, based on Xcel’s initially proposed capital budget of \$480 million.

<sup>32</sup> See, e.g., Department Report at 22.

<sup>33</sup> 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*, Docket No. E999/DI-20-627, Comments of the Office of the Attorney General, at 15-16 (Oct. 16, 2020) (stating that “rider recovery [should be capped] at Xcel’s initial estimates to encourage fiscal discipline and align the Company’s incentives with ratepayer interests”).

<sup>34</sup> *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*, Docket E002/M-20-680, Xcel Energy Reply Comments, at 11 (Oct. 30, 2020) (hereinafter “Xcel October 30 Reply Comments in Docket E002/M-20-680”).

<sup>35</sup> Department Report at 22.

<sup>36</sup> See *In re Application for Approval to Commit Funds in Excess of \$2,500,000 for the Phase 1 Grid Modernization Project, to Defer Certain Computer Software Development Costs, Etc.*, Docket No. 2018-0141, Decision and Order No. 36320, at 24 (Mar. 25, 2019).

recover, for each meter installed and in operating service, no more than the lower of actual incurred costs or their proposed aggregated costs applied on a per meter basis.<sup>37</sup>

Applying two separate and distinguishable cost recovery caps for capital versus variable O&M and labor costs will serve to “hold the Company to its high-level estimates for each category” and incentivize cost control.<sup>38</sup>

CUB continues to believe that an “asymmetrical cost true-up,” similar to what has been used in Xcel’s MYRP proceedings, could be an integral part of ensuring costs are managed and savings passed onto consumers.<sup>39</sup> Under this approach, the Company would refund to customers any capital or O&M cost savings if the projects are completed below the established recovery cap. In contrast, the Company and its shareholders would be responsible for any cost overruns above the cap.

In addition to establishing cost recovery caps, the Commission should require the pass-through of project revenues and savings to utility customers in accordance with the TCR rider statute.<sup>40</sup> As both Xcel and the Department have acknowledged, knowing the “full extent of [advanced meter] capabilities at the outset” of deployment is unrealistic, given that these technologies are relatively novel.<sup>41</sup> However, Xcel has “plann[ed] [its] grid advancement with the future in mind, . . . to provide both immediate and increasing value for [its] customers over the long-term.”<sup>42</sup> These technologies provide the Company with the “potential to produce future revenue” through a platform paid for by utility customers,<sup>43</sup> and that revenue value should be shared.

As AMI and FAN technologies become better integrated into the grid and their capabilities are realized, methods of revenue generation might also come into clearer focus. For example, data provided by AMI meters has substantial value to both the Company and third parties and “could be used . . . to develop and improve utility systems and programs.”<sup>44</sup> As the Department recognized in its Report, the need for transparency and revenue sharing is “exacerbated . . . [by] the financial interest Xcel has in Energy Impact Partners” (“EIP”).<sup>45</sup> Like the Department, CUB is concerned that the “significant value” of “aggregated utility and customer data” provided by AMI meters will not be passed onto customers, even when “third-party companies contracting with Xcel are using [that data] to develop products and

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<sup>37</sup> CUB October 16 Comments in Docket No. E999/DI-20-627 at 7.

<sup>38</sup> *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*, Dockets Nos. E999/DI-20-627; E002/M-20-680, Comments of the Office of the Attorney General, at 16 (Oct. 16, 2020).

<sup>39</sup> CUB October 16 Comments in Docket No. E999/DI-20-627 at 6.

<sup>40</sup> Minn. Stat. § 216B.16, subd. 7b states, in part, that “the commission may approve a tariff mechanism for the automatic annual adjustment of charges for the Minnesota jurisdictional costs *net of associated revenues* of . . . new transmission or distribution facilities that are certified as a priority project or deemed to be a priority transmission project under section 216B.2425” (emphasis added).

<sup>41</sup> Department Report at 15 (citing Xcel October 30 Reply Comments in Docket E002/M-20-680 at 3).

<sup>42</sup> Xcel Initial Petition, Attachment 4 at 10.

<sup>43</sup> *Id.* at 15.

<sup>44</sup> *Id.* at 16-17.

<sup>45</sup> *Id.* at 17.



offerings.”<sup>46</sup> If Xcel shares data with EIP or other third parties that generate revenue from its use, then customers could be left “uncompensated by the system, operations, and personnel it funded” unless the Commission demands Company transparency and the pass-through of revenues.<sup>47</sup> For these reasons, CUB supports the Department’s recommendation that “all associated revenues or savings will be passed through to the ratepayer until otherwise determined by the Commission.”<sup>48</sup>

#### **IV. Project Reporting and Performance Evaluations**

In its Report, the Department agreed with CUB and several other stakeholders that Xcel be held accountable for providing the promised benefits of its grid modernization projects.<sup>49</sup> Tracking the deployment of AMI and FAN is an essential part of ensuring these benefits are realized in a timely and efficient manner. CUB agrees with the Department’s recommendation for an Advanced Grid Infrastructure Annual Report to be used as a method for “review[ing] and evaluat[ing] performance on an ongoing basis.”<sup>50</sup> As outlined in the Department’s Report, this annual filing would include, at a minimum, the following information:

1. Update[s] on the project scope and intended functionalities (including percentage of budget spent) and plan for [the] upcoming year, including actual capital and operations and maintenance costs/savings incurred;
2. AMI and FAN implementation (installation and integration) progress compared to [the projects] planned timeline (until full operation);
3. AMI-related product and services offering overview and listing, including any modifications to those offerings, a summary of implementation progress, and a three-year plan;
4. AMI-related plans (required filings, related offerings or programs, etc.), and status;
5. AMI metrics report: progress on current metrics, baseline data gathering progress, baseline data updates, and updates on metrics or targets.

Because AMI and FAN are emerging technologies, CUB believes the Company should include a narrative description of AMI and FAN developments—including any changes to functionality or potential future uses—that the Company has identified or acted on. Should the Company disable AMI functionalities for any reason, it should explain its reasoning for doing so and identify the number of impacted meters. The Annual Report should further detail any additional revenue-generating opportunities that have been created by AMI and FAN, as well as all entities with whom AMI data is shared.

CUB additionally continues to recommend that the Company be required to file quarterly or semi-annual reports outlining, at a minimum, the following aspects of its projects:

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<sup>46</sup> *Id.*

<sup>47</sup> *See, e.g.,* Department Report at 16-17.

<sup>48</sup> *Id.* 16 (emphasis omitted).

<sup>49</sup> *Id.* at 14.

<sup>50</sup> *Id.* at 30.

1. The Company's plans and scope for implementation of its AMI and FAN projects in the upcoming months and/or year;
2. The status of the number of meters and units of telecommunications infrastructure that the Company has installed and placed in service, in comparison to the Company's plans and scope, to be reported in aggregate, by class, and by class and census block or 9-digit ZIP code;
3. The status of the installation of the FAN in comparison to the Company's plans and scope;
4. Implementation status of metering and network communications headend systems in comparison to the Company's plans and scope; and
5. The actual capital and O&M costs incurred by the Company, as well as any proposed deferred costs.<sup>51</sup>

The Department's and Fresh Energy's additions to the quarterly reports would require the Company to provide information on customer awareness and satisfaction of AMI technologies and benefits, customer complaints, forthcoming filings, and other relevant metrics on project status and issues.<sup>52</sup> CUB supports these modifications.

These reporting mechanisms play an instrumental role in ensuring the Company meets its promises and delivers identified benefits to consumers. To the extent that cost recovery is accomplished through the TCR rider, these reporting requirements can also serve to reduce the likelihood of double recovery. Because there are "likely to be overlapping or difficult-to-distinguish costs related to distribution investments" split between the rider and base rates, the Commission should, to the extent reasonably practicable, require a detailed accounting of costs. By demanding a comprehensive analysis of project spending, the Company and Commission can identify whether costs should be "attributed to AGIS investments" or "classified as other distribution investments" to be recovered through a rate case.<sup>53</sup>

## **V. Future consideration of significant distribution system investments**

CUB believes the regulatory path of the AGIS investments from Xcel's 2019 IDP provides several lessons for future grid modernization investments. As we have noted, Xcel's AMI and FAN investments traveled a complex and at times unclear regulatory path, spanning at least five Commission dockets<sup>54</sup> and more than three years (so far). Still, crucial questions remain unanswered even as cost recovery looms on the horizon. We strongly agree with Synapse, which stated in a recent Report: "Using multiple regulatory processes and dockets to review grid modernization investments creates

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<sup>51</sup> CUB October 16 Comments in Docket No. E999/DI-20-627 at 8.

<sup>52</sup> See Department Report at 31; *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*, Docket No. E999/DI-20-627, Comments of Fresh Energy, Attachment A (Sep. 25, 2020).

<sup>53</sup> CUB October 16 Comments in Docket No. E999/DI-20-627 at 2-3; Department Report at 13-14.

<sup>54</sup> See, e.g., Dockets Nos. E-002/M-17-797; E-002/M-19-666; E-999/DI-20-627; E-002/M-20-680; E-002/M-21-814.

regulatory uncertainty and ambiguity that can lead to inefficient and less effective oversight by the Commission and stakeholders.”<sup>55</sup> As CUB discussed in our comments in Docket 21-814:

It has been unclear to CUB precisely which questions would be taken up by the Commission at each stage of this process, and we have, at times, spent substantial time on analysis that were apparently not helpful to the Commission at the times it was presented . . . . Further, full participation in these proceedings requires expertise that CUB—and, we believe, most other parties—does not have in house. We have engaged outside experts when possible, but that is resource intensive and is particularly difficult when the timing and scope of proceedings are unclear.”<sup>56</sup>

Since our initial comments on Xcel’s 2019 IDP, CUB has argued that rider recovery of AMI and FAN is not justified. To our knowledge, no determination on this question was ever made by the Commission, and at this late date, we see few options for base rate recovery of these investments.

We strongly encourage the Commission to set clear procedures for evaluating grid modernization proposals and cost recovery petitions, develop formal criteria for evaluating certification requests in Integrated Distribution Plans, and establish efficient timelines for determining whether proposals are eligible for recovery through the TCR rider. More clarity on the regulatory pathway for substantial distribution system investments would help parties like CUB more effectively participate in proceedings. We encourage the Commission to consider the Synapse report and the Department’s comments on this topic.

## **VI. Conclusion**

CUB greatly appreciates the Commission’s consideration of these comments. In conclusion, CUB recommends that the Commission take the following actions:

1. Reiterate that cost recovery remains contingent upon a showing of prudence and the accomplishment of Commission-approved metrics and performance evaluations, and that the burden of proof remains on the Company.
2. Establish cost recovery caps for Xcel’s AMI and FAN projects, with separate cost caps being set for capital versus variable O&M and labor costs.
3. Require the pass-through to ratepayers of all revenues or savings generated by or associated with AMI and FAN.
4. Require comprehensive annual reporting on project metrics and performance as outlined in the Department’s Report, with the addition of CUB’s recommended requirements, set forth below:

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<sup>55</sup> *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*, Docket No. E002/M-21-814, Synapse’s Review and Assessment of Grid Modernization Plans, Prepared for the Minnesota Department of Commerce, at ii (Feb. 9, 2022).

<sup>56</sup> CUB March 30, 2022 Comments in Docket E002/M-21-814 at 4.

- a. Narrative description of AMI and FAN developments, including any changes to functionality or potential future uses;
  - b. Description and explanation of any AMI or FAN functionalities that have been disabled, along with a quantitative analysis of the number of impacted meters;
  - c. Revenue-generating opportunities identified or engaged that relate to the use of AMI, FAN, or the use of associated data or distributed intelligence technologies;
  - d. All entities with whom AMI data is shared.
5. Require additional quarterly or semi-annual reporting for certain metrics, as outlined by CUB, the Department, and Fresh Energy in these and prior comments.
6. Establish a single, consistent regulatory pathway—and associated method of reviewing—future grid modernization investments.
  - a. Set clear procedures for reviewing grid modernization proposals and cost recovery petitions;
  - b. Develop formal criteria for evaluating certification requests in Integrated Distribution Plan proceedings;
  - c. Establish efficient timelines for determining whether proposals are eligible for recovery through the TCR rider.

Sincerely,

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**STATE OF MINNESOTA  
BEFORE THE PUBLIC UTILITIES COMMISSION**

In the Matter of Northern States Power  
Company d/b/a Xcel Energy's Petition for  
Approval of the Transmission Cost Recovery  
Rider Requirements for 2021-2022, and the  
Resulting Adjustment Factors by Customer Class

Dockets Nos. E-002/M-21-814  
E-002/M-20-680

**CERTIFICATE OF SERVICE**

I, Brandon Crawford, hereby certify that I have served a true and correct copy of the following documents to all persons at the addresses indicated on the attached list by electronic filing, electronic mail, courier, interoffice mail or by depositing the same enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

1. Initial Comments of the Citizens Utility Board of Minnesota

Dated this 17th day of October, 2022.

/s/ Brandon Crawford

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Generic Notice	Residential Utilities Division	residential.utilities@ag.stat e.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_20-680_Official
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