

September 18, 2020

Dr. Aditya Ranade, Deputy Commissioner  
Minnesota Department of Commerce, Division of Energy Resources  
85 7th Place East, Suite 500  
St. Paul, MN 55101

**RE: CENTER FOR ENERGY AND ENVIRONMENT'S COMMENTS 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**

Dear Deputy Commissioner Ranade:

Center for Energy and Environment (CEE) appreciates the opportunity to provide Comments 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 in response to the August 20, 2020 Minnesota Department of Commerce (Department) Notice of Solicitation of Stakeholder Input and Comments (Notice) in this docket.

We thank the Department for engaging stakeholders on this topic and appreciate the comprehensive set of questions the Department posed for discussion. For our Comments, CEE will focus on how we believe the performance evaluation and metrics for Xcel Energy's advanced metering infrastructure (AMI) and field area network (FAN) projects should align, inform, or be informed by the performance metrics and Performance Incentive Mechanism Process approved in the Minnesota Public Utilities Commission (Commission) investigation into performance metrics for Xcel Energy's electric utility operation in Docket No. E-002/CI-17-401 (Performance Metrics Docket).<sup>1</sup>

CEE believes that there are valuable lessons in the Performance Metrics Docket related to selecting appropriate and useful performance metrics that may be helpful to apply to the development and selection of metrics to assess the performance of Xcel Energy's AMI and FAN investments. We also note that many of the metrics established in the Performance Metrics Docket will capture the long-term costs, benefits, and performance of the AMI and FAN investments. Further, Xcel Energy's AMI and FAN investments, once fully implemented and operating, will contribute to Xcel Energy's ability to report certain metrics adopted in the Performance Metrics Docket.

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<sup>1</sup> This corresponds to question number seven, under *Section B. Metrics*, of the Department's Notice.

However, while CEE sees many opportunities to connect the Performance Metrics Docket to this docket, we believe that separate project-specific, short-term metric reporting will be necessary for the Commission to properly oversee the implementation and initial deployment of Xcel Energy's AMI and FAN investments. We think this activity should stand alone, and do not recommend including those detailed, short-term metrics related to tracking progress toward full implementation of the AMI and FAN investments within the broader Performance Metrics Docket framework. The Performance Metrics Docket is designed to provide a long-term, high-level, and broad view of utility performance. It is not designed or well-suited to track progress toward the milestones of implementing specific projects or programs. For that reason, CEE recommends that the Commission develop short- and mid-term performance metrics and reporting requirements to assess Xcel Energy's performance in implementing and deploying the AMI and FAN technology in a docket separate from the Performance Metrics Docket.

#### The Performance Metrics Docket

As noted above, the Performance Metrics Docket is designed to take a long-term, high-level, and broad view of Xcel Energy's performance as an electric utility. The Commission initiated the Performance Metrics Docket in June of 2017 upon approving a multi-year rate plan for Xcel Energy's electric operations. The Performance Metrics Docket broadly seeks to "identify and develop performance metrics and standards, and potentially incentives, to be implemented during the multi-year rate plan."<sup>2</sup> With the key purpose to further align the company's performance with the public interest.<sup>3</sup>

The Commission established that the highest level goal of the Performance Metrics Docket is as follows: "The goals in overseeing the rates, investments, and returns made by the investor-owned utilities in Minnesota are to promote the public interest by ensuring environmental protection; adequate, efficient, and reasonable service; reasonable rates; and the opportunity for regulated entities to receive a fair and reasonable return on their investments."<sup>4</sup> The Commission then adopted broad outcomes that support that goal: affordability, reliability, customer service; environmental performance, and cost effective alignment of generation and load. Finally, the Commission adopted a number of metrics to measure the established outcomes.

The Performance Metrics Docket is ongoing. The next steps in the docket include identifying and establishing metric evaluation criteria and benchmarks, exploring the option of an online, public-facing performance dashboard, and developing a proposal for a performance incentive mechanism for demand response.<sup>5</sup>

#### Lessons from the Performance Metrics Docket

As a part of the Performance Metrics Docket, the Commission adopted a Performance Incentive Mechanism (PIM) framework, developed and recommended by the Office of the Attorney General,

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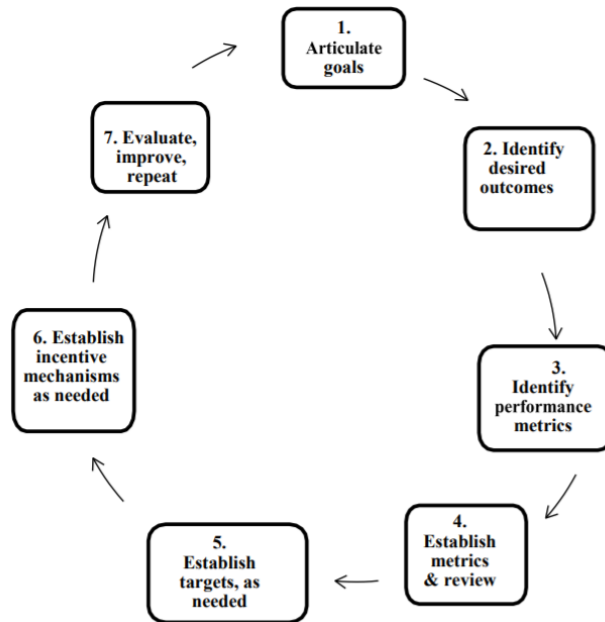
<sup>2</sup> Ordering Point 8, page 68, of the Commission's June 12, 2017 Finding of Fact, Conclusions, and Order in Docket No. E-002/GR-15-826.

<sup>3</sup> Page 11 of the Commission's January 8, 2019 Order in Docket No. E-002/CI-17-401.

<sup>4</sup> Page 11 of the Commission's January 8, 2019 Order in Docket No. E-002/CI-17-401.

<sup>5</sup> Commission's April 16, 2020 Order in Docket No. E-002/CI-17-401.

to guide the Commission and stakeholders through the development and selection of performance metrics.



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The PIM hierarchy to approaching performance metric development was instrumental to the Performance Metrics Docket. The step-wise approach of beginning with an overarching goal first, then determining the key outcomes that would indicate that goal, and finally choosing metrics that measure those outcomes, helps to ensure that selected metrics are tied to broader goals and outcomes and truly measure the things worth measuring.

The PIM process may provide a helpful framework in thinking through the appropriate short- and mid-term goals and metrics related to the implementation and roll-out of Xcel Energy’s AMI and FAN investments. Though the PIM process took significant time and effort for the Commission and stakeholders to progress through in the Performance Metrics Docket, we think the framework could be applied in a streamlined and timely manner for this docket. CEE recommends that the Commission apply the PIM framework, with the exception of step six (“establish incentive mechanisms as needed”), to Xcel Energy’s AMI and FAN investments by determining the primary goal or goals for the implementation and roll-out of the AMI and FAN investments, then identifying the key outcomes that would indicate that the goal or goals are met, and finally selecting a manageable number of metrics to measure each outcome. We believe that any consideration of financial incentives related to AMI and FAN should occur in the Performance Metrics Docket and should focus on higher-level, broad utility performance.

Additionally, the Commission established performance metric design principles in the Performance Metrics Docket to be applied to the development and selection of metrics. The metric design principles are as follows:

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<sup>6</sup> Page 5 of the Commission’s January 8, 2019 Order in Docket No. E-002/CI-17-401.

- Tied to the policy goal. A metric should clearly reflect whether or not the underlying policy goal is being met. That is, it should seek and evaluate data that is specifically tied to the particular policy goal underlying the metric.
- Clearly defined. The method of calculating a metric should be precise and unambiguous to enable meaningful comparisons and to reduce potential disputes.
- Able to be quantified using reasonably available data. Using already reported data or data that is readily available will reduce administrative burden and the costs associated with implementing the metric.
- Sufficiently objective and free from external influences. Metrics should seek to measure behaviors that are within a utility's control and free from exogenous influences, such as weather or market forces.
- Easily interpreted. Metrics should exclude the effects of factors outside a utility's control so they provide a better understanding of utility performance and should use measurement units that facilitate comparisons across time and utilities (i.e., "per kWh" or "per customer").
- Easily verified. Straight-forward data collection and analysis techniques should be used, and independent third-party evaluators can further ensure accurate verification with respect to performance metrics.
- Should complement and inform evaluation of utility performance. Performance metric systems should be designed to complement – not replace – other parts of a utility's regulatory system such as multi-year rate plans and cost trackers.<sup>7</sup>

CEE found these principles to be highly valuable in considering, discussing, and selecting metrics in the Performance Metrics Docket. Applying these principles helped to ensure that metrics selected in the Performance Metric Docket were meaningful and useful and helped to streamline reporting requirements in that docket. We recommend applying these same principles to the metrics discussed and developed for Xcel Energy's AMI and FAN investments.

#### Assessing AMI and FAN Investments through the Performance Metrics Docket

While the Performance Metrics Docket did not specifically focus on AMI or FAN technologies, the costs and benefits associated with the AMI and FAN investments will flow into many of the performance metrics adopted in the Performance Metrics Docket. The outcomes and metrics established through the Performance Metrics Docket were designed to evaluate the utility's performance at the highest and broadest level. Therefore, the established metrics capture the high-level impacts of any major utility investment. We expect that the impacts of the AMI and FAN investments will be captured through metrics across each of the five established outcomes in the Performance Metrics Docket.

For instance, the monetary costs and savings of these investments will be reflected in the metrics under the affordability outcome; any impacts on outages and power restorations from AMI and

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<sup>7</sup> Ordering Point 2, C on page 12 of the Commission's January 8, 2019 Order in Docket No. E-002/CI-17-401.

FAN will be reflected in the metrics under the reliability outcome; customers' feelings about their ability to access their energy data at a more detailed level and potentially reduced outage times would be reflected in the metrics under the customer service quality outcome; emissions benefits from increased system efficiency and potentially new energy efficiency or demand response offerings enabled by AMI would be captured in the metrics under the environmental outcome; and impacts of new demand response programs enabled by AMI would be captured under the metrics measuring the cost-effective alignment of load and generation outcome.

CEE does not see a need for any new or additional metrics in the Performance Metrics Docket to measure the performance of the AMI and FAN technologies. We believe that the existing metrics in that docket<sup>8</sup> will adequately measure the high-level performance of Xcel Energy's AMI and FAN technologies.

Once the AMI and FAN investments are fully deployed and the Commission becomes more familiar and comfortable with the technologies and how they are being used by the utility and customers, there may be opportunities to discontinue reporting and reviewing certain metrics adopted during the implementation and initial deployment phases. At such a time, the Commission and stakeholders could rely on the Performance Metrics Docket to continue monitoring performance at a higher level.

#### Conclusion

In conclusion, CEE recommends that the Department recommend a process to the Commission that:

- applies the PIM Process framework adopted in the Performance Metrics Docket to develop performance metrics for Xcel Energy's AMI and FAN investments;
- applies the metric design principles adopted in the Performance Metrics Docket to develop performance metrics for Xcel Energy's AMI and FAN investments;
- develops short- and mid-term performance goals, outcomes, and metrics to assess Xcel Energy's performance in implementing and deploying the AMI and FAN technologies in a docket separate from the Performance Metrics Docket; and
- assesses the long-term performance of the AMI and FAN technologies through the existing metrics adopted in the Performance Metrics Docket.

CEE appreciates the opportunity to provide input on this docket and thanks the Department for its consideration of our remarks.

Sincerely,

/s/

Audrey Partridge

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<sup>8</sup> Detailed in Ordering Point 1 of the Commission's September 18, 2019 Order in Docket No. E-002/CI-17-401.

Regulatory Policy Manager

## **AFFIDAVIT OF SERVICE**

**DOCKET NO. E999/DI-20-627**

I, Audrey Partridge, hereby certify that on this 18<sup>th</sup> day of September 2020, I served *Center for Energy and Environment's Comments 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* in Docket No. E999/DI-20-627 on the following persons on the attached Service Lists by:

XX placing such filing in envelopes, properly addressed, and depositing the same in the Post Office at the City of Minneapolis, for delivery by the United States Post Office as directed by said envelopes.

XX electronic filing

/s/ Audrey Partridge  
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