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September 25, 2020

—Via Electronic Filing—

Aditya Ranade, PhD
Deputy Commissioner of Energy Resources
Minnesota Department of Commerce
85 7th Place East, Suite 280
St. Paul, MN 55101

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

RE: RESPONSE TO DEPARTMENT NOTICE
STAKEHOLDER PROCESS INFORMING REPORT AND XCEL ENERGY 2019
INTEGRATED DISTRIBUTION PLAN
DOCKET NOS. E999/DI-20-627 AND E002/M-19-666

Dear Dr. Ranade and Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits the enclosed Response to the Minnesota Department of Commerce in response to the Department's August 20, 2020 NOTICE OF SOLICITATION OF STAKEHOLDER INPUT AND COMMENTS, as modified by the September 18, 2020 NOTICE OF EXTENDED COMMENT PERIOD. We also submit this Response directly to the Minnesota Public Utilities Commission in our 2019 Integrated Distribution Plan docket, because it includes an update on our Field Area Network.

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 Jody Londo at jody.l.londo@xcelenergy.com or (612) 330-5601 or me at bria.e.shea@xcelenergy.com or (612) 330-6064 if you have any questions regarding this filing.

Sincerely,

/s/

BRIA E. SHEA
DIRECTOR, REGULATORY & STRATEGIC ANALYSIS

Enclosures
c: Service Lists

**Northern States Power Company,
a Minnesota corporation**

**Response to Minnesota Department of Commerce
Notice of Solicitation of Stakeholder Input and Comments**

**In the Matter of the Department Stakeholder Process Informing the Report on
the Metrics, Performance Evaluation Method, 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**

Introduction

Northern States Power Company, doing business as Xcel Energy, submits these Comments to the Minnesota Department of Commerce and the Minnesota Public Utilities Commission in response to the Department's August 20, 2020 NOTICE OF SOLICITATION OF STAKEHOLDER INPUT AND COMMENTS, as modified by the September 18, 2020 NOTICE OF EXTENDED COMMENT PERIOD.

The Company appreciates the opportunity to provide these comments and looks forward to further dialogue related to our Advanced Metering Infrastructure (AMI) and Field Area Network (FAN) projects. Although these are substantial new investments, we believe existing Commission protocols and requirements for utility investments and program or service proposals – most notably our burden of proof for prudence – provide appropriate transparency with regard to scope, costs, and customer protections and implications related to the investments. Additionally, the statutory framework and specific requirements for advanced grid investment certification and cost recovery as outlined in Docket Nos. E002/M-15-962, E002/M-17-775 & E002/M-17-776, and E002/M-17-797 add to and complement these already robust procedures. As such, we believe it is reasonable, appropriate, and practicable to rely on existing Commission protocols and procedure to assess the appropriateness of any metrics, methods for evaluating performance, and consumer protections or other conditions that should be applied to the certified AMI and FAN projects.

Prior to responding to the specific topics identified by the Department, we want to inform the Commission and stakeholders of a change in our plans for one component of the FAN. The change is necessitated by a Federal Communications Commission (FCC) ruling that has limited the effectiveness of WiMAX technology and driven U.S.

vendors to abandon support of the product – forcing Xcel Energy to look for alternatives. During the course of the procedural process for our AMI and FAN certification request, the impact of the FCC ruling was playing out such that in our April 10, 2020 Reply Comments in Docket No. E002/M-19-666, we noted a migration from WiMAX to Long-Term Evolution (LTE) over time as technology advances. That change has occurred more abruptly than we expected.

The FCC ruled in late 2018, with an implementation date of April 2020, that the use of a network spectrum (frequency) called Citizen Band Radio Spectrum was going to be controlled by third parties to minimize congestion and interference, particularly for the U.S. Coast Guard and Navy, which also used this spectrum for operations. This is the spectrum that the WiMAX technology was designed to use when Xcel Energy selected it in 2014 as a part of the FAN. The FCC ruling that impacted the spectrum used with WiMAX not only made using that frequency more expensive to operate (with high O&M service fees to the designated third parties), but also quickly made the WiMAX technology obsolete, because the cost to network vendors to upgrade to meet FCC rules was cost-prohibitive with WiMAX. The new FCC regulations would have required Xcel Energy to replace WiMAX with new versions of hardware and software equipped with Spectrum Access Service (SAS) capability no later than October 14, 2020.¹ This requirement has driven U.S. vendors to abandon support of the WiMAX product, thus forcing Xcel Energy to look for alternative technology.

As a result, in 2020, Xcel Energy replaced all WiMAX supported technology with public cellular data technology to support continued connectivity to the WiSUN mesh network to support the AMI meters that have been deployed to-date. This is a reasonable interim solution because it is a proven technology in use by other utilities with similar needs and will ensure Xcel Energy meets its commitments to our customers as well as position the Company to potentially convert to private LTE in the future.

This change for a portion of our FAN plans is particularly relevant to these comments as it is a real-life example of the implications associated with evolving and emerging technologies – and highlights the importance of transparent and flexible processes that allow for changes outside of the Company's control and facilitate the Company identifying opportunities in the future that would provide additional benefits to our customers.

¹ SAS is the name the FCC gave to the three companies it certified to monitor entities that chose to use the CBRS (Citizen Band Radio Spectrum), which is the shared/free spectrum or frequency we planned to use WiMAX over.

COMMENTS

A. Cost Recovery Petition Content

The Commission outlined baseline Advanced Grid Intelligence and Security (AGIS) cost recovery petition filing requirements in its September 27, 2019 Order in Docket E002/M-17-797, Order Point 9 (provided as Attachment 1 to the Department's Notice).

1. *Should Xcel provide any additional information to ensure clarity and transparency of costs when seeking cost recovery for the AGIS investments?*

We believe the informational requirements the Commission has established for certification and cost recovery, including those in the referenced 17-797 Order are robust and facilitate transparency. These requirements include, among other things, a business case and comprehensive assessment of qualitative and quantitative benefits to customers. The information requirements specific to cost recovery are extensive and structured to provide transparency into not only costs, but also expected benefits – and thus requires the Company to paint a comprehensive picture of not only the direct costs of the technologies and their deployment, but also how it intends to implement the advanced grid technologies with customers. We provide a list of the existing extensive cost recovery-related requirements and the location of the associated information we included in our November 2019 Integrated Distribution Plan (IDP) to meet each of the requirements as Attachment A to these Comments.²

B. Metrics

In its July 23, 2020 Order in Docket No. E002/M-19-666, the Commission indicated that certification of the AMI and FAN projects was made with the recognition that future cost recovery will be based upon Xcel accomplishing Commission-approved metrics and performance evaluations. As a result, any future proposals for cost recovery of investments certified by the Commission's July 23 Order must be accompanied by a proposal for specific metrics and evaluation methods, and a detailed plan describing how Xcel Energy will maximize the benefits of the investments for ratepayers. Thus, the Department requests Xcel and stakeholder input on the appropriate metrics and evaluation methods, including but not limited to:

² Docket No. E002/M-19-666.

1. *Are the metrics proposed by Xcel's witnesses Gersack, Bloch, Harkness, Cardenas, Duggirala sufficient to determine performance of the AMI and FAN projects?*³

The Company believes that the metrics proposed by the referenced witnesses are sufficient and appropriate at this stage to monitor and assess our performance on the AMI and FAN projects. As stated in our 2019 IDP (at page 164), we proposed to file an annual report on our AGIS initiative that would include various progress metrics that relate to the different parts of our business that are involved in the AGIS implementation. We outlined these metrics in Exhibit____(MCG-1), Schedule 11 of Company Witness Michael C. Gersack's Direct Testimony provided as Attachment M1 to our 2019 IDP and certification request. As we explained, our intent with our proposed metrics is to provide the Commission and stakeholders comprehensive information on deployment progress for monitoring purposes, and performance and achievement of customer and system benefits as we implement the advanced grid initiatives.

We outlined two sets of metrics in our certification request that we believe would provide important, relevant, and appropriate insights into our AMI and FAN implementation from both operational and customer perspectives. The first set of metrics we proposed are designed to provide customer survey results on: (1) our communications and outreach programs prior to installation, (2) installation and deployment metrics of the AMI and FAN projects, and (3) metrics designed to measure the adoption of new products and services, and (4) customer satisfaction with our overall deployment. These metrics will provide relevant information from a customer perspective for the Commission and stakeholders to monitor the progress of our AMI and FAN implementation from pre- to post-deployment from both operational and program and service perspectives.

We derived the second group of metrics from the benefits described in witness testimony and as estimated in our Cost Benefit Analyses (CBA). While we believe it will be appropriate to establish metrics that align with the benefits we anticipate from our implementation, the specific benefits and the timing of when we will realize those benefits is dependent on the specific technology, design, scope and implementation plans approved by the Commission. As such, this second set of metrics we outlined in our certification request is illustrative. And, as we explained in our Reply Comments in the 2019 IDP,⁴ while we thoughtfully prepared the CBAs and believe they are reasonable estimates of the costs and initial benefits we expect from these

³ See Xcel Energy's November 1, 2019 Integrated Distribution Plan, Attachments M1-M5. See Attachment 2 to this Notice.

⁴ See Xcel Energy Reply Comments, Attachment A at page 27, Docket No. E002/M-19-666 (April 22, 2020)

investments, the specific benefit and cost amounts are based on an estimate from the point in time we began our analysis. As we actually enable future AMI and FAN capabilities, developing additional metrics may be appropriate. Given that such metrics would be necessarily tied to the specific capabilities and plans approved by the Commission, it is premature to establish such metrics at this time.

2. *What are specific, accountable metrics that should be established?*

As we stated in our certification request and further committed above, we are committed to report the specific metrics we proposed in Exhibit____(MCG-1), Schedule 11 of the Gersack Direct Testimony, provided as Attachment M1 to our 2019 IDP and certification request. We do not propose any other additional specific benefit or metric at this time, as we believe the focus should be on the near-term at this stage. We reproduce Exhibit____(MCG-1), Schedule 11 for easy reference below, though we note that we are no longer proposing any metrics related to technologies not certified by the Commission (FLISR and IVVO).

Table 1: Reproduction of Gersack Direct Exhibit____(MCG-1), Schedule 11

	Description	AGIS Report*
Customer Outreach and Education	Survey results of customers on the adequacy and clarity of communications prior to installation of advanced meters.	AGIS
Installation and Deployment	Number of advanced meters installed.	AGIS
	Percentage of FAN deployed.	AGIS
	Number of feeders with FLISR enabled.	AGIS
	Number of feeders with IVVO enabled.	AGIS
	Number of customers electing to opt-out of AMI installation.	AGIS
	Number of calls to Customer Contact Center and meter installation vendor regarding meter installation.	AGIS / SQ
	Number of complaints regarding AMI installation.	AGIS / SQ
Post-Deployment	Avoided Customer Minutes Out due to FLISR installation.	AGIS / SQ
	Energy Reduction (MWh) due to IVVO that result in cost savings and CO ₂ emissions reduction.	AGIS
	Percentage of customers with advanced meters that receive estimated bills.	AGIS / SQ
	Percentage of customers with an advanced meter that have made a complaint of inaccurate meter readings.	AGIS / SQ
	Survey of customer satisfaction with outage related communications.	AGIS
	Number of customers with an advanced meter with an active web portal account.	AGIS
	Number of monthly, unique visits to the web portal (My Account).	AGIS

** Service Quality potential impacts and reporting noted.*

3. *Are there existing metrics in use by any utility or imposed by a commission that would be useful to evaluate Xcel's AMI and FAN projects?*

The metrics we included in our certification request and that we believe continue to be appropriate initial measures of our performance were based experience with the Company's Public Service Company of Colorado (PSCo) affiliate deployment and review of other utilities such as Ameren Corporation, Baltimore Gas & Electric, Potomac Electric Power Company, and Hawaiian Electric. We selected metrics from these sources that represented the scope and scale of the project we proposed at the time of certification.

4. *When should any given metric be established: prior to submittal of the cost recovery petition, at the time of any petition for cost recovery, at the time of a petition for a new service program, modified tariff, or other change to existing service or offerings enabled by AMI and/or FAN?*

Metrics that are designed to track the progress of the project implementation should be established in conjunction with the cost recovery request where those plans are detailed and so where the Company would define the technology, scope, and timing – all of which are essential to assessment of progress. Similarly, as future product and service offerings are developed, it may be appropriate as part of those proceedings to consider whether, and if so, what specific metrics may be appropriate to measure the Company's implementation and/or its effectiveness. Pairing the plan and associated revenue requirements provides the necessary tie between the costs incurred to develop the functionality that will create the benefits – providing necessary balance between costs and benefits.

5. *For any given metric, what baseline data and targets are necessary in order to evaluate performance?*

Minnesota statutes provide the just and reasonable standard as the measure against which adequate service should be considered.⁵ Beyond this, we believe our Quality of Service Plan (QSP) Tariff proceedings in Docket Nos. E,G002/CI-02-2034 and E,G002/M-12-383 and the Commission's Performance Metrics and Incentives (PBM) proceeding in Docket No. E002/CI-17-401 offer important guidance to this question.

⁵ Minn. Stat. § 216B.04 requires that every public utility shall furnish safe, adequate, efficient, and reasonable service. Minn. Stat. § 216B.09 gives the Commission authority to set just and reasonable service standards.

The Commission's purpose with our QSP proceeding was to ensure adequate service and provide a foundation for which to measure that service against.⁶ Also instructive in the QSP proceeding, the Commission recognized the importance of having sufficient and consistent data upon which to determine fair and reasonable standards for performance. Specifically, in the case of reliability data, the Commission required the QSP performance threshold be renegotiated once the Company had five years of raw outage data under its new Outage Management System with a consistent outage count methodology.⁷ The Commission's August 12, 2013 Order approving the current framework of our QSP Tariff further recognized the value of actual performance information over a period of time (in this case, seven years) in determining that the new benchmarks can be expected to maintain satisfactory service quality without penalizing the Company for occasional fluctuations in its performance.⁸ As such, a period of time where sufficient, consistent, actual performance data is collected and reported is appropriate to form a foundation from which a baseline level of performance and targets can later be determined.

Through the parallel and ongoing Performance Metrics and Incentives (PBM) proceeding in Docket No. E002/CI-17-401, the Commission established the OAG's proposed performance incentive mechanism (PIM) process and concurred with the design principles the Company offered –incorporating those principles into the PIM process as a way to add further guidance and clarity to the process of identifying and developing performance metrics and standards, and potentially incentives for Xcel Energy.⁹ We believe this framework, which the Commission characterized in the same Order as “sufficiently structured but necessarily flexible” provides helpful and important guidance to development of performance standards, metrics and incentives.

The PIM process has seven steps that begin with articulating goals, identifying desired outcomes, identifying performance metrics, establishing metrics, then establishing targets, as needed. The key metric design principles the Commission adopted are as follows:

- *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.

⁶ “The Commission's expressed purpose throughout this matter has been to investigate and correct as necessary Xcel's reporting of its achievement or non-achievement of existing performance standards rather than to raise those standards.” See Order, In the Matter of an Investigation and Audit of Norther States Power Company's Service Quality Reporting, Docket No. E,G002/CI-02-2034 (October 13, 2006).

⁷ See Order (October 13, 2006).

⁸ See Order Approving Amendments to Service-Quality Tariff, Docket Nos. E,G002/CI-02-2034 and E,G002/M-12-383 (August 12, 2013).

⁹ See Order (January 8, 2019).

- *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.

Finally, the Commission's Order established the Goals and Outcomes – the first two steps of the PIM process.

As this proceeding and progress along the PIM process wheel has continued, further issues are being examined and discussed. For example, the necessity of a period of data gathering and reporting before finalizing any specific performance measures or thresholds. In the PBM proceeding, we have recommended tracking and reporting the initial metrics ordered by the Commission for a period of three years to determine whether those metrics are the correct ones to be tracking – and if they remain valid as time goes by.¹⁰ Further, a period of at least three years allows room for natural variations in performance. This is also consistent with the recognition of the importance of sufficient, consistent actual performance data to inform standards and metrics in the QSP proceeding.

In the case of AMI and FAN, with the deployment occurring over a 3-year period (2022-2024), the starting point for any metrics will also be important. First, it will be important to establish the goals and expected outcomes from any standards or metrics. Second, the performance evaluation period should begin no sooner than the

¹⁰ See Xcel Energy, Reply Comments, Docket No E002/CI-17-401 (December 12, 2019).

actual performance data would be considered consistent. Outside of deployment-related performance reporting, we believe this will require a deployment to be complete and the initial effects (i.e., initial program enrollments, use of new services, improvements in operational efficiency, etc.) to have stabilized in order to validly measure the impacts that might be expected on a go-forward basis. Finally, after consistent data over a sufficient time period is available, monitoring of actual performance can begin.

To the extent the Commission determines a performance threshold is appropriate, the basis could include combinations of historic actual Company performance, relevant comparisons to other companies or utilities, industry benchmarks, or other relevant comparative information. Again, we believe the QSP and PBM proceedings will be instructive.

6. *Do stakeholders recommend use of the proposed Fresh Energy metrics filed in the E002/M-19-666 on April 22, 2020? If Xcel were to provide information on the associated baseline or targets, are the proposed metrics reasonable and sufficient to measure and track performance of AMI and FAN?*

Our understanding of what Fresh Energy proposed in our 2019 IDP is that the Commission require the Company to define and track metrics tied to the major AGIS Cost-Benefit Analysis categories. We agree with this concept. However, as discussed elsewhere in our response to this Notice, any metrics must result from a specific project scope, technology, plan, and timing. Further, we believe any metrics should focus on the most important areas of performance for the Commission and our customers (goals and outcomes in the PIM process). Therefore, while the benefits identified in the CBA may serve as a roadmap of future benefits, some may be tied to the development of specific programs or services in the future. As such, the appropriateness or need for any metrics associated with those, as well as the specifics associated with measurement should be determined as those programs or services are proposed or committed – again pairing program costs/revenue requirements and expected results.

7. *Should, or how should the metrics align with, inform, or be informed by, the Performance Based Mechanism (PBM) docket (E999/CI-17-401) or the annual Safety, Reliability and Service Quality docket (or other relevant dockets)? Should any metric that is established for AMI and FAN be incorporated into the PBM docket or Service Quality docket, another proceeding, or considered only with respect to the cost recovery dockets pertaining to the certified AMI and FAN projects?*

As we have discussed, we believe the PBM docket and the Company's QSP proceeding provide important guidance and framework for development of any AMI and/or FAN-related metrics. We would expect that any reporting associated with AMI and FAN would remain in the cost recovery docket initially, and provided as an ongoing compliance requirement. We expect some of metrics to be short-term - for example, those associated with deployment of the meters or programs and services. For those that the Commission determines are important measures of the public interest and should extend beyond deployment, it may be appropriate for them to move to a different forum at some point. For example, it may be appropriate for reliability-related reporting or operational impacts to established reliability metrics (e.g., SAIDI, SAIFI) from deployment of AMI/FAN to be reported in concert with the Company's other reliability reporting on those same metrics.

C. Method for Evaluation of Performance

General Performance Evaluation

1. *What are specific, accountable methods for evaluating the performance of the AMI and FAN projects?*

The metrics we outlined in Exhibit____(MCG-1), Schedule 11 of the Gersack Direct Testimony included with our 2019 IDP and certification request are specific, accountable methods for evaluating our initial performance, which we believe is the most relevant at this stage. It may be appropriate for the Company to begin tracking and reporting on other aspects of the final AMI and FAN plan that the Commission approves. However, as we have discussed and as has been recognized in the PBM and QSP proceedings, development of standards, metrics and any thresholds should rely on a sufficient and consistent baseline of data from which to measure future performance.

2. *What are the attributes or FAN functions or uses that should be explored or enabled by Xcel?*

Despite the shift away from WiMAX, the FAN functions will be the same with our near-term LTE strategy. The FAN specifically provides two-way communication, which in the case of AMI, is to the meters being deployed for AMI. The primary uses/functions of the FAN are to support specific capabilities and functionalities as described in the AMI section of our 2019 IDP and certification request. Further use of the FAN will depend on Company deployment of expanded AMI or other technologies beyond AMI, as well as the Company's longer-term plans with respect to FAN technology, which we have discussed are currently in flux.

3. *Should performance evaluations be tied to AMI and FAN implementation dates (as listed on Table 56 in Xcel Energy's 2019 IDP) or some other factor or consideration?*

Program	Implementation Timeline
ADMS ¹⁰	In-service 2020
AMI	Meter roll-out 2021-2024
FAN	Deployment 2021-2024 (preceding AMI deployment by approximately six months)

Expectations for the Company's performance with respect to its implementation of AMI and FAN must be tied to the implementation timeline and plan. To do otherwise would not be reasonable. FAN-related metrics we proposed in Exhibit____(MCG-1), Schedule 11 of the Gersack Direct Testimony, and as we have elsewhere in this response explained remain relevant and appropriate include Percentage of FAN Deployed and indirectly, Percentage of customers with advanced meters that receive estimated bills, and Percentage of customers with an advanced meter that have made a complaint of inaccurate meter readings.

4. *What considerations should be given to short-term performance (installation rates of AMI, applications for new programs or offerings, etc.) versus long-term system performance (relating to overall system efficiencies and improvements) capabilities outlined in Xcel Energy's 2019 IDP?*

At this stage, we believe the focus should be on the near-term, with an eye to deploying the technologies to support long-term system performance and capabilities. Our initial focus will necessarily be on the foundational implementation and getting that right. Once that is successfully underway, we believe it will be appropriate to turn our attention to achieving the longer-term vision, capabilities, and functionalities. On a higher level, we believe metric performance should be measured consistent with the PBM docket, established through a significant regulatory process, and relate to the following three categories: (1) customer focus, (2) utility performance, and (3) public policy.

5. *How should evaluation of AMI and FAN performance be considered at the time of cost recovery (petitions that are likely to be filed in multiple filings, over several years)?*

We believe the metrics we outlined in our 2019 IDP and certification request (and as noted in this response, throughout) remain relevant to our initial AMI and FAN deployment – with the exception of the technologies that were not certified – specifically, FLISR and IVVO. Review of these metrics will be appropriate to consider in evaluating our implementation of AMI and FAN technology.

6. *Are there considerations in recommending methods to evaluate performance that would align with, inform, or be informed by on-going dockets or previous Commission decisions or records?*

As noted previously, we believe the PBM proceeding in Docket No. E002/CI-17-401 provides important learnings, framework, process and guidance for identifying and establishing performance measures.

7. *Are there any other issues that should be considered when evaluating the performance of AMI and FAN projects?*

As we have responded throughout, it is necessary to evaluate the performance of AMI and FAN relevant to the specific technology, scope, and timeline approved by the Commission.

Programs and Services Offerings

8. *What AMI- and FAN-enabled programs or services (e.g., service/ rate tier plans, remote connect and disconnect procedures, third-party service and data sharing, etc.) do stakeholders want Xcel Energy to propose? Provide as much detail as possible.*

Although this inquiry is not directed at the Company, we believe it is worthwhile to discuss our approach to identifying programs and services to develop. We considered the following factors:

- *Customer research.* As detailed in the Company's 2019 IDP and certification request – the Gersack Direct Testimony and Customer Strategy specifically – the Company has performed and is continuing to perform direct customer research to understand customers' concerns, expectations, and aspirations around smart meters. Insights from these efforts have helped us prioritize customer products and services for the near- and long-term.
- *Industry research.* With the majority of U.S. electricity consumers currently having smart meters, there is a wealth of information available both from peer utilities as well as the research community with respect to the most impactful products and services to effectively leverage the AMI and FAN technologies.
- *Technology assessment.* Working with a variety of key technology partners and stakeholders, the Company identified and prioritized capabilities and solutions that were feasible given the known characteristics of our AMI and FAN technologies.
- *Internal Product Development.* Workgroups across the Company's customer products

and services organization developed the comprehensive roadmap outlined in our Customer Strategy.

9. *Is the Xcel proposed Customer Experience Timeline (see Attachment 3) comprehensive or are there other customer experiences or benefits that should be considered or established?*

As explained above, the Company's recommended product and service roadmap was informed by extensive customer research, industry research, technology assessment, and internal product development activities. We believe these are important and appropriate foundations on which to build such a timeline. That said, we do not view this as a comprehensive statement of the capabilities of AMI and FAN, and we intend to continue developing customer experiences and benefits over time.

10. *How would stakeholders prioritize those AMI- and FAN-enabled programs or services (e.g., based on the expected customer benefits and associated risks of each offering, the extent to which the program/ offering would offset costs or reduce rates, or other)?*

When prioritizing products and services for development and release to customers, the Company considered the following:

- 1) *Customer benefit.* Both from the participant and societal viewpoint, we prioritized those services that had the highest impact and reached the greatest number of customers.
- 2) *Technology readiness.* Many of the new capabilities made possible by the Company's selected meter solution require time to perform the necessary research and development to fully realize. We therefore prioritized services for release to customers based on technology development timelines.
- 3) *Market readiness.* As energy service markets develop, particularly in the areas of demand management and distributed energy resources enablement, the Company prioritized those services along likely market development timelines.

Again, these considerations are foundational and appropriate to ensure the Company is in a position to deliver on its plan.

11. *Under what expected timeframe should the programs be designed, be filed for approval, and implemented?*

As described above, the Company's proposed implementation timelines attempt to optimize for customer benefits, technology readiness, and market readiness. To the

extent a program requires Commission approval, we will submit it with sufficient time for the appropriate regulatory procedural process to occur.

12. *At what point should design elements (notice plans for AMI installation, AMI customer data rights and protection, Home Area Network activation plan requirements, cybersecurity impacts, etc.) be considered by the Commission or stakeholders, if at all? Are there any design elements that should be explicitly considered or approved by the Commission?*

All of this was part of information we provided with our request for certification and considered by the Commission. Specifically, we provided our initial notice plan, customer data rights and protection (all of which follow and comply with the Commission's framework for customer data access and protection), cybersecurity considerations, discussion of our plans for HAN functionality and many other design elements with our certification request – and would expect to provide comparable information again with our request for Transmission Cost Recovery (TCR) rider recovery. One reason for this is to keep the Commission informed on prominent aspects of our implementation, but another would be because our cost recovery request will include the costs of some of these, for example, the deployment-related customer communications.

Additional design elements may require Commission approval and others may be more informational. We are committed to keeping the Commission informed on our plans as they progress, whether that takes the form of Petitions seeking approval or informational filings outlining the status of our development of various customer programs, services, or technology capabilities. To the extent there are costs associated with any of these that we seek to specifically recover, we would provide the relevant details either in a separate filing seeking approval and cost recovery, or in conjunction with other AMI and FAN costs – for example, through the TCR Rider.

13. *Should the evaluation of performance for AMI or FAN be tied to a metric, successful establishment of a program or service, or other consideration or factor?*

The Company believes that the relevant metrics (i.e., for the certified portions of our AGIS proposal) set forward in Exhibit____(MCG-1), Schedule 11 of the Gersack Direct Testimony provided as Attachment M1 to our 2019 IDP and certification request establishes a balanced set of performance evaluation measures for our initial AMI and FAN implementations. As we have discussed elsewhere in this response, to the extent we propose a specific program or service, it may be appropriate to eventually establish a performance measurement for that program or service. For the most part, we believe that should be done in conjunction with the program specifics

and cost recovery request. However, some programs or services may be a part of our Conservation Improvement Program (CIP) efforts, and as such, should follow the established measurement, benefits evaluation, and reporting protocols established for CIP.

14. *How can the Commission ensure customer benefits materialize from AMI and FAN implementation should Xcel Energy delay or fail to propose desired programs and services?*

We are committed to maximize the AMI and FAN technologies for the benefit of our customers. However, delays or changes to plans for customer programs and services could occur for many reasons, some of which we can control and some that we cannot. The FCC-driven change to our planned WiMAX technology is an example of something that is out of our control and that impacted our plans. As we have otherwise noted, we are committed to keep the Commission updated through informational reporting on the status of our plans.

Program and Services Compliance Filing

15. *Would a requirement for Xcel Energy to provide a compliance report outlining anticipated new programs and services, expected design periods (and methods for stakeholder input), projected Commission filing dates, projected system impacts, and its progress on any on-going new service programs or services offerings be sufficient?*

As we have noted, we are open and committed to keeping the Commission updated on our plans. We would suggest the frequency of the reporting correlate to the status and timeline for implementation. For the most part, we believe an annual report for the types of information the question contemplates would be appropriate.

- a. *If so, how often should Xcel Energy file an AMI and FAN program and service offering compliance report (Progress Report)? What time period should the report cover (i.e. 2, 5, 10-years)?*

We expect development of new programs and services enabled by AMI and FAN to be most concentrated in the initial years, including and immediately following mass deployment. As such, we believe annual reporting that would continue for two years after AMI mass deployment is complete would be appropriate.

- b. *Is a May 1, 2022 inaugural filing date reasonable for an initial Progress Report (if using Xcel's annual compliance report filing timing proposal from its 2019 IDP) or should the Progress Report be filed in conjunction with the requests for cost recovery? Or is some other timeframe reasonable?*

The Company believes May 1, 2022 would be reasonable for an initial progress report. We note additionally that we would expect to include some form of project status with our requests for cost recovery that correlates the dollars we have recovered with our plans and projections for the next cost recovery period.

- c. *Should stakeholders be provided an opportunity to review and comment on Progress Reports?*

We believe the Commission's standard practices and procedures provide robust opportunities for stakeholders to review and comment in open proceedings. As such, we would expect stakeholders would have the same opportunity to comment on reports associated with AMI and FAN as they have to comment on reports in other proceedings.

- d. *How should the Commission consider program and service offering compliance reports in relation to any Xcel Energy request for AMI and FAN cost recovery?*

We would expect that the Commission would treat these compliance filings like it would any other compliance filing associated with cost recovery.

- e. *Should Xcel Energy be required to file information on programs or offerings not pursued, including the reasons for not pursuing them?*

Given the nature of program and service development, the number of offerings that are not pursued far exceeds the number of offerings that are. As such, we believe the focus should be on selected or planned offerings and the benefits they are expected to produce rather than the full breadth of potential development activities. We note that if we change our plans, we would also discuss the reasons we decided to no longer pursue a program(s).

D. Consumer Protections

1. *What consumer protections should be considered at the time of petition for cost recovery?*

and

2. What consumer protections should be required or established outside of cost recovery petitions?

We believe the Commission has already established notable customer protections in the form of transparency associated with our AMI and FAN investments. To date, we have laid out our plans in detail, the costs we expect to incur, and the benefit we expect to result – and we intend for that to continue, including updates on actual costs incurred and benefits realized. As the Commission does with all investments, it will review these costs to determine whether they are prudent – and we bear the burden of proving the prudence of our investments for cost recovery. Allowing stakeholders and the Commission to review in-depth information regarding our costs, benefits, and processes in connection with prudence determinations is a powerful customer protection.

Other customer protections could include customer privacy or confidentiality. In the case of AMI and FAN, customer protections could include a description of the Company's customer data practices and the actions the Company has taken to ensure data security. As we bring forward programmatic filings, it may be appropriate to establish additional targeted protections related to the specific elements of the proposals.

3. Does the Commission need to establish cost cap provisions for the AMI and FAN projects, beyond what was articulated in the Commission's April 27, 2010 Order Point 4 in Docket No. E002/M-09-1048 – which limits Transmission Cost Recovery to estimates provided at the time of the eligibility determination?

Rather than cost caps, we believe a transparent process whereby we detail the projects, we detail how we oversee and govern the projects and expenditures, and we demonstrate the steps and actions we have taken to manage costs in the short- and long-term would be the most reasonable, appropriate, and practical approach to protecting customers from unforeseen costs or cost overruns.

The cost cap provisions in the Order referenced in this question were established for regional transmission system investments that the Company has had decades of experience in developing, and the Commission has had decades of reviewing, leading to more accurate cost estimates at the time of eligibility proceedings. When established, these provisions did not contemplate the later 2015 modifications that were made to the statute allowing for recovery of advanced grid investments through the same TCR Rider mechanism. Unlike previous transmission investments, advanced grid technologies such as AMI and FAN are relatively new, developing technologies and are rapidly evolving such that even earlier AMI deployments may

not provide a full picture of what to expect in terms of deployment. This is especially true with respect to telecommunications as evidenced by the change with WiMAX at the Federal level.

Finally, we note that cost caps exist as one method for controlling whether an investment is prudent. There are also regulatory cost recovery review processes that provide control. For instance, detailed cost information is provided in rate cases and riders and the burden is on the Company to prove prudence. Given the nature of these investments, a cap for these types of projects is not appropriate.

- a. If yes, what are reasonable cost caps and how should they be considered in the light of the (expected) iterative request for cost recovery in multiple TCR Rider or rate case requests? In relation to percent progress of installation? In relation to benefits realized? Or another metric?*

N/A

- 4. Should the Commission establish variable Operations and Maintenance (O&M) and cost recovery caps, for AMI and FAN (no more than the lower of actual incurred costs or Xcel Energy's variable costs as proposed in the 2019 IDP, applied on a per-meter basis) or use some other O&M cost protections?*

First, as we discussed above, we do not believe that cost caps for these types of investments are appropriate in general; instead, the Company bears the burden of proving its costs are prudent, and we are confident stakeholders and the Commission can hold us to that standard without cost caps.

- 5. Should the Commission require all revenues from the Advanced Grid Intelligence and Security (AGIS) Initiative to flow to ratepayers?*
and
- 6. Should the Commission establish a pass-through methodology and/or develop a process or mechanism to pass the savings and revenues associated with the AGIS Initiative on to the Company's customers in a reasonable timeframe? If so, please provide examples or proposals.*

The regulatory process contemplates review of costs and revenues associated with program proposals to ensure they are flowing to customers appropriately. We do not believe that regular process needs to be modified here. Of course, we will always be looking for opportunities to maximize our investments and value for our customers.

Any specific program proposals should be addressed in a separate docket focused on the specific circumstances of such a proposal.

7. *How should public input be considered or solicited by Xcel Energy or the Commission on AMI and FAN implementation; should Xcel Energy be required to hold public meetings or hearings, and if so, what should the timing be for those meetings in relation to project implementation?*

We recognize the value stakeholder input can afford and have consistently provided forums for such input. As discussed and detailed in our 2019 IDP, in partnership with Great Plains Institute, we conducted four stakeholder workshops leading up to our filing in an effort to educate, build a better understanding of our work and stakeholders' needs, and to continue an iterative and ongoing dialogue and build a mutual understanding of our processes and the content of the IDP.¹¹ These included a session dedicated to the cost benefit framework for advanced grid investments and a session dedicated to the Company's financial and other forecasts – and 5-year action plan. As we noted, we internalized this feedback and the feedback we received on our 2018 IDP and factored it into the information we presented in our 2019 IDP – including how we presented the costs and benefits of our advanced grid components, and our proposal to implement IVVO in Minnesota (that was ultimately not certified by the Commission).

As we noted in our Reply Comments in our 2019 IDP and certification request proceeding, we are open to technical conferences or workshops to explore certain issues. In our August 28, 2020 compliance filing in Docket Nos. E002/M-19-666 and E002/M-20-680, we outlined as one option, a hybrid approach that would pair the Company's miscellaneous filing (for cost recovery) with the Company hosting a series of virtual public forums intended to educate and solicit input from interested stakeholders about the Company's AMI and FAN investments. We proposed the meetings be held in the approximately 60 days surrounding the Company's TCR cost recovery proposal – covering key aspects of our investment proposals that were the subject of broad stakeholder interest, specific issues the Department suggested should be the subject of a contested case, and/or specific stakeholder or informational directives from the Commission's Order certifying our proposed AMI and FAN investments. Please see that filing for more details.

¹¹ See Section XVI. Stakeholder Engagement beginning at page 260.

CONCLUSION

Xcel Energy appreciates the opportunity to provide these comments. We look forward further dialogue and exploration of these issues.

Dated: September 25, 2020

Northern States Power Company

IDP Grid Modernization Content Roadmap

<p>Planning Objectives: The Commission is facilitating comprehensive, coordinated, transparent, integrated distribution plans to:</p> <ul style="list-style-type: none"> · Maintain and enhance the safety, security, reliability, and resilience of the electricity grid, at fair and reasonable costs, consistent with the state's energy policies; · Enable greater customer engagement, empowerment, and options for energy services; · Move toward the creation of efficient, cost-effective, accessible grid platforms for new products, new services, and opportunities for adoption of new distributed technologies; and, · Ensure optimized utilization of electricity grid assets and resources to minimize total system costs. <p>· Provide the Commission with the information necessary to understand Xcel's short-term and long-term distribution system plans, the costs and benefits of specific investments, and a comprehensive analysis of ratepayer cost and value.</p>
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Source	Requirement/Description	IDP	Rate Case: AGIS [as presented in Gersack as Exhibit __ (MCG-1), Schedule 2]
Docket No. E002/C1-18-251 Aug. 30, 2018 Order (Updated to include changes from Jul 16, 2019 Order)	A. Baseline Distribution System and Financial Data: Financial Data		
	26. Historical distribution system spending for the past 5-years, in each category:		
	a. Age-Related Replacements and Asset Renewal b. System Expansion or Upgrades for Capacity c. System Expansion or Upgrades for Reliability and Power Quality d. New Customer Projects and New Revenue e. Grid Modernization and Pilot Projects f. Projects related to local (or other) government-requirements g. Metering h. Other	II.D, III.B, XIII, XIV	Addressed in IDP
	28. Projected distribution system spending for 5-years into the future for the categories listed above, itemizing any non-traditional distribution projects	II.D-E, IX, XIV, Attachments M1, M2, M3, M5	Gersack II(C) AGIS Expenditures 2020-2029 Gersack V(D)(2) AGIS PM Costs 2020-2029 Bloch V(A) AGIS - Distribuion 2020-2029 Bloch V(D)(5) AMI - Distribution 2020-2029 Bloch V(E)(3) FAN - Distribution 2020-2029 Bloch V(F)(6) FLISR - Distribution 2020-2029 Bloch V(G)(7) IVVO - Distribution 2020-2029 Harkness V(E)(3)(c)(4) AMI - IT 2020-2029 Harkness V(E)(4)(c)(4) FAN - IT 2020-2029 Harkness V(E)(5)(c) FLISR - IT 2020-2029 Harkness V(E)(6)(c) IVVO - IT 2020-2029 Harkness V(E)(7) AGIS - IT 2020-2029 Duggirala Schedules 2, 3, 4
	29. Planned distribution capital projects, including drivers for the project, timeline for improvement, summary of anticipated changes in historic spending. Driver categories should include:		
	a. Age-Related Replacements and Asset Renewal b. System Expansion or Upgrades for Capacity c. System Expansion or Upgrades for Reliability and Power Quality d. New Customer Projects and New Revenue e. Grid Modernization and Pilot Projects f. Projects related to local (or other) government-requirements g. Metering h. Other	II.D, IX, XIV, and Attachments F1, G1, M1, M2, M3	Gersack II(B) Exec Summary - Drivers Gersack IV Drivers of AGIS Strategy Gersack II(C) Exec Summary - Implementation Gersack V(A) Component Implementaion Gersack V(B) Overall Timeline/Implementation Bloch V(A) Projects and Timeline Bloch V(B) Drivers (Limitations of System) Bloch V(D) AMI Bloch V(E) FAN Bloch V(F) FLISR Bloch V(G) IVVO Harkness V(B)(E) AGIS Overview Harkness V(E)(3) AMI Harkness V(E)(4) FAN Harkness V(E)(5) FLISR Harkness V(E)(6) IVVO
	30. Provide any available cost benefit analysis in which the company evaluated a non-traditional distribution system solution to either a capital or operating upgrade or replacement	VI and Attachment H	Addressed in IDP

Source	Requirement/Description	IDP	Rate Case: AGIS [as presented in Gersack as Exhibit (MCG-1), Schedule 2]
Docket No. E002/CI-18-251 Aug. 30, 2018 Order (Updated to include changes from Jul 16, 2019 Order)	D. Long-Term Distribution System Modernization and Infrastructure Investment Plan		
	2. Xcel shall provide a 5-year Action Plan <u>as part of a 10-year long-term plan</u> for distribution system developments and investments in grid modernization based on internal business plans and considering the insights gained from the DER futures analysis, hosting capacity analysis, and non-wires alternatives analysis. The 5-year Action Plan should include a detailed discussion of the underlying assumptions (including load growth assumptions) and the costs of distribution system investments planned for the next 5-years (expanding on topics and categories listed above). Xcel should include specifics of the 5-year Action Plan investments. Topics that should be discussed, as appropriate, include at a minimum:	XIV and Attachments J, M1	Gersack II Exec Summary Gersack IV Drivers of AGIS Strategy Gersack V AGIS Components and Implementation Gersack VI Customer Experience
	· Overview of investment plan: scope, timing, and cost recovery mechanism	II, IX and XIV and Attachment M1	Gersack II Exec Summary
	· Grid Architecture: Description of steps planned to modernize the utility's grid and tools to help understand the complex interactions that exist in the present and possible future grid scenarios and what utility and customer benefits that could or will arise.	IX, X, XIV, Figure 73 and Attachments M1-M4	Gersack V AGIS Components and Implementation Bloch V(D) AMI Bloch V(E) FAN Bloch V(F) FLISR Bloch V(G) IVVO Harkness V(E)(3) AMI Harkness V(E)(4) FAN Harkness V(E)(5) FLISR Harkness V(E)(6) IVVO Harkness V(D) Cyber Security Cardenas V(F) Quantifiable Benefits Gersack VI Customer Experience (Benefits)
	· Alternatives analysis of investment proposal: objectives intended with a project, general grid modernization investments considered, alternative cost and functionality analysis (both for the utility and the customer), implementation order options, and considerations made in pursuit of short-term investments. The analysis should be sufficient enough to justify and explain the investment.	IX and Attachments M1-M3	Gersack V(C) Alternatives to AGIS Bloch V(D)(6) AMI Alternatives Bloch V(F)(7) FLISR Alternatives Bloch V(G)(6) IVVO Alternatives Harkness V(E)(4)(g) FAN Alternatives
	· System interoperability and communications strategy	IX, X and Attachments M2, M3	Bloch V(D)(7) AMI Interoperability Bloch V(F)(8) FLISR Interoperability Bloch V(G)(7) IVVO Interoperability Harkness V(E)(4) FAN Overview Harkness V(E)(4)(b) FAN Interoperability Harkness V(E)(3)(b) AMI Integration
	· Costs and plans associated with obtaining system data (EE load shapes, PV output profiles with and without battery storage, capacity impacts of DR combined with EE, EV charging profiles, etc.)	IDP XI (F)	Addressed in IDP
	· Interplay of investment with other utility programs (effects on existing utility programs such as demand response, efficiency projects, etc.)	Attachment M1	Gersack VI(B)(4) Energy Savings Programs
	· Customer anticipated benefit and cost	V.D.2, IX.F-G, XVI and Attachments M1-M5, O1-O4	Gersack VII Prudence of AGIS Investments (CBA) Duggirala Overall CBA Costs, Benefits, Results Gersack VIII Bill Impacts <i>Costs and Benefits are also discussed throughout Bloch V (AGIS), Harkness V (AGIS), and Cardenas V (AGIS)</i>
	· Customer data and grid data management plan (how it is planned to be used and/or shared with customers and/or third parties)	IX, X and Attachments M1, M3	Gersack VI Customer Experience (overall) Gersack VI(B)(3) Digital Experience (web portal) Gersack Schedule 3 Customer Strategy (Appendix B: Data Access, Privacy, Governance) Harkness V(D) Cyber Security
	· Plans to manage rate or bill impacts, if any	IX.G, XIV.A and Attachment M1	Gersack VIII Bill Impacts
	· Impacts to net present value of system costs (in NPV \$/MWh or \$/MW)	XIV and Attachment L	Addressed in IDP

Source	Requirement/Description	IDP	Rate Case: AGIS [as presented in Gersack as Exhibit (MCG-1), Schedule 2]
Docket No. E002/CI-18-251 Aug. 30, 2018 Order (Updated to include changes from Jul 16, 2019 Order)	· For each grid modernization project in its 5-year Action Plan, Xcel should provide a cost-benefit analysis <u>based on the best information it has at the time and including a discussion of non-quantifiable benefits. Xcel shall include all information used to support its analysis.</u>	IX, X and Attachments M1-M5, O1-O4, filed Workpapers	Gersack VII(A) CBA Gesack VII(B) Qualitative Benefits Duggirala II(B) Quantitative Inputs Duggirala II(C) Results Duggirala IV Qualitative Benefits
	· Status of any existing pilots or potential for new opportunities for grid modernization pilots	IX, X, XIII and Attachment M1	Gersack III Grid Mod Background (Res TOU Pilot) Gersack IV(C)(2) Advanced Rate Design/Billing Options
	3. In addition to the 5-year Action Plan, Xcel shall provide a discussion of its vision for the planning, development, and use of the distribution system over the next 10 years. The 10-year Long-Term Plan discussion should address long-term assumptions (including load growth assumptions), the long-term impact of the 5-year Action Plan investments, what changes are necessary to incorporate DER into future planning processes based on the DER futures analysis, and any other types of changes that may need to take place in the tools and processes Xcel is currently using.	IX, X, XIV and Attachments M1, M2	Gersack II Exec Summary Gersack V AGIS Implementation Gersack VI(D) Customer Experience (Long Term) Bloch D(4)(d)(1) AMI Benefits (DER) Bloch G(4)(b) IVVO Benefits (DER)
Docket No. E002/CI-18-251 July 16, 2019 Order	8. Provide all information, analysis and assumptions used to support the cost/benefit ratio for AMI, FAN, and FLISR; and IVVO and CVR cost-benefit analysis as part of its 2019 IDP filing or other future filings.	IX.F and Attachments M1-M5, O1-O4, filed Workpapers	Duggirala Overall - CBA testimony points to the other witnesses who provide detailed cost and benefit forecasts.
Docket No. E002/M-17-797 Sept. 27, 2019 Order	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:	IX, X and Attachments M1-M5	Gersack II Exec Summary Gersack III Grid Mod Background Gersack IV(D) Commission Policy and Stakeholder Input Gersack V(A) AGIS Components Gersack V(B) Overall Implementation Gersack VII(A) CBA Quantified Benefits Gersack VII(B) Qualitative Benefits Bloch V(D) AMI Bloch V(E) FAN Bloch V(F) FLISR Bloch V(G) IVVO Harkness V(E)(3) AMI Harkness V(E)(4) FAN Harkness V(E)(5) FLISR Harkness V(E)(6) IVVO
	A. Scope of Investment		
	1. Investment Description		
	a. Detailed description of proposed investment and project life		
	b. If multiple components, overview of costs and descriptions of each		
	i. Include purpose and role		
	ii. Explain known and potential future use cases for each component		
	iii. Explain known and potential value streams and how each component fits with state policy, statutes, rules and Commission orders		
	iv. Describe beneficiaries of each investment (who, how many, over what time period)		
	c. Articulation of principles, objectives, capability, functionalities, and technologies enabled by investment; and		
	d. Interrelation and interdependencies with other existing or future investments, including overlapping costs: scope, amount, timing.		
	2. Alternatives considered	Attachments M1-M3, N1-N4	Gersack V(C) Alternatives to AGIS Bloch V(D)(5) AMI Cost Development (RFP discussion) Bloch V(D)(6) AMI Alternatives Bloch V(F)(6) FLISR Cost Development Bloch V(F)(7) FLISR Alternatives Bloch V(G)(5) IVVO Cost Development Bloch V(G)(6) IVVO Alternatives Harkness V(E)(4)(e) FAN Cost Development Harkness V(E)(4)(g) FAN Alternatives AGIS Supporting files, Vol. 2B (on disc)
	a. If a Request for Proposal was used provide:		
	i. The RFP issued, including list of all services or assets scoped in the RFP		
	ii. Provide summary of responses		
	iii. Provide assessment of bids and factors used for selection		
	iv. The scope of offerings or services included in the selected bid		
	b. If not, what was used.		
	3. Costs	IX and Attachments M5, O1-4, filed Workpapers	Duggirala II(A) Model Structure and Requirements Duggirala Schedules 2, 3, 4, 5
	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)		
	ii. Indirect Costs		
	iii. Tangible Costs		
	iv. Intangible Costs		
	v. Real Costs		
	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 M5	Duggirala II(A) Model Structure and Requirements
	c. If there is overlap or costs included in both categories, outline the overlapping costs and explain.	Attachment M5	Duggirala II(A) Model Structure and Requirements Duggirala Schedules 2, 3, 4, 5
	d. For each of the cost categories outline whether the investment has been partially approved or included in previous or on-going docket riders, rate cases, or other cost recovery mechanisms or note all costs are included in the instant petition.	II.D-E, IX, XIV, XV	Gersack II(C) Exec Summary - AGIS Implementation Gersack III Grid Mod Background Bloch V(C) Grid Mod Efforts to Date Harkness V(E)(2) Grid Mod Efforts to Date

Docket No. E002/M-19-666
2019 Integrated Distribution Plan
Attachment C - Page 4 of 4

Source	Requirement/Description	IDP	Rate Case: AGIS [as presented in Gersack as Exhibit (MCG-1), Schedule 2]
Docket No. E002/M-17-797 Sept. 27, 2019 Order	4. Detailed Analysis of the type of proposed or multiple cost effectiveness analysis utilized:	Attachment M5	Duggirala III
	a. Least-cost, best-fit (Xcel proposes in IDP Reply comments)		
	b. Utility Cost-test; and		
	c. Integrated Power System and Societal Cost test		
	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	V.D, IX and Attachments D2, M1-M5, O1-O4, filed Workpapers	Duggirala II(C) CBA Results AGIS Supporting files, Vol. 2B (on disc) Gersack VII(A)(1) CBA Overview
	1. Provide Discount Rate Used and Basis; and	Attachment M5 and filed Workpapers	Duggirala II(A) Model Structure and Requirements
	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:	IX and Attachments M1, M5	Duggirala II(B) Quantitative Inputs Gersack IX Metrics and Reporting
	a. Identify quantitative costs and qualitative costs: i. Use quantitative methods to address qualitative benefits to the extent possible. ii. Explain system used to assess value and priorities to qualitative benefits (points and/or weighting); and iii. Identify sensitivity ranges on estimates or value	V.D, IX and Attachments D1, D2, M5, O1-O4	Duggirala Overall CBA Costs, Benefits, Results
	b. Include a long-term bill impact analysis	IX, XIV and Attachment M1	Gersack VIII Bill Impacts
	c. Include a reference case/scenario without the project (or group of projects); and	IX, XIV and Attachments M1, M5	Duggirala II(A) Model Structure and Requirements Gersack VIII Bill Impacts
	d. Apply the following principles to ensure the investment analysis has:	Attachments M1-M5	<i>The Company has incorporated these principles throughout its analyses, including:</i> Gersack V AGIS Components and Implementation Bloch V(D) AMI Bloch V(E) FAN Bloch V(F) FLISR Bloch V(G) IVVO Harkness V(E)(3) AMI Harkness V(E)(4) FAN Harkness V(E)(5) FLISR Harkness V(E)(6) IVVO Cardenas V(F) Quantifiable Benefits Gersack VI Customer Experience (Benefits) Duggirala Overall CBA Costs, Benefits, Results
	i. compared with traditional resources or technologies;		
	ii. clearly accounted for state regulatory and policy goals;		
	iii. accounted for all relevant costs and benefits, including those difficult to quantify;		
	iv. provided symmetry across relevant costs and benefits;		
	v. applied a full life-cycle analysis;		
	vi. provided a sufficient incremental and forward-looking view;		
	vii. is transparent;		
	viii. avoided combining or conflating different costs and benefits;		
	ix. discuss customer equity issues, as needed;		
	x. assessed bundles and portfolio where reasonable; and		
	xi. addressed locational and temporal values.		

CERTIFICATE OF SERVICE

I, Lynnette Sweet, hereby certify that I have this day served copies of the foregoing document on the attached lists 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-20-627
E002/M-19-666

Dated this 25th day of September 2020

/s/

Lynnette Sweet
Regulatory Administrator

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John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd. St. Louis, MO 63119-2044	Electronic Service	No	OFF_SL_20-627_DI-20-627
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-627_DI-20-627
Riley	Conlin	riley.conlin@stoel.com	Stoel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-627_DI-20-627
George	Crocker	gwille@nawo.org	North American Water Office	PO Box 174 Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_20-627_DI-20-627
Arthur	Crowell	Crowell.arthur@yahoo.com	A Work of Art Solar	14333 Orchard Rd. Minnetonka, MN 55345	Electronic Service	No	OFF_SL_20-627_DI-20-627
David	Dahlberg	davedahlberg@nweco.com	Northwestern Wisconsin Electric Company	P.O. Box 9 104 South Pine Street Grantsburg, WI 548400009	Electronic Service	No	OFF_SL_20-627_DI-20-627
James	Denniston	james.r.denniston@xcenergy.com	Xcel Energy Services, Inc.	414 Nicollet Mall, 401-8 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_20-627_DI-20-627
Curt	Dieren	curt.dieren@dgr.com	L&O Power Cooperative	1302 S Union St Rock Rapids, IA 51246	Electronic Service	No	OFF_SL_20-627_DI-20-627
Carlton	Doyle Fontaine	carlton.doyle.fontaine@senate.mn	MN Senate	75 Rev Dr Martin Luther King Jr Blvd Room G-17 St Paul, MN 55155	Electronic Service	No	OFF_SL_20-627_DI-20-627
Brian	Draxten	bhdraxten@otpc.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380498	Electronic Service	No	OFF_SL_20-627_DI-20-627

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Rebecca	Eilers	rebecca.d.eilers@xcelenergy.com	Xcel Energy	414 Nicollet Mall - 401 7th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_20-627_DI-20-627
Bob	Eleff	bob.eleff@house.mn	Regulated Industries Cmte	100 Rev Dr Martin Luther King Jr Blvd Room 600 St. Paul, MN 55155	Electronic Service	No	OFF_SL_20-627_DI-20-627
Betsy	Engelking	betsy@geronimoenergy.com	Geronimo Energy, LLC	8400 Normandale Lake Blvd Suite 1200 Bloomington, MN 55437	Electronic Service	No	OFF_SL_20-627_DI-20-627
Oncu	Er	oncu.er@avantenergy.com	Avant Energy, Agent for MMPA	220 S. Sixth St. Ste. 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-627_DI-20-627
James C.	Erickson	jericksonkbc@gmail.com	Kelly Bay Consulting	17 Quechee St Superior, WI 54880-4421	Electronic Service	No	OFF_SL_20-627_DI-20-627
Jim	Erickson	jim.g.erickson@xcelenergy.com	Xcel Energy	414 Nicollet mall 7th Flr Minneapolis, MN 55401	Electronic Service	No	OFF_SL_20-627_DI-20-627
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Russell	Olson	rolson@hcpd.com	Heartland Consumers Power District	PO Box 248 Madison, SD 570420248	Electronic Service	No	OFF_SL_20-627_DI-20-627

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Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_20-627_DI-20-627
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Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_19-666_Official
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