



October 16, 2020

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

RE: Docket No. E999/DI-20-627

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

Dear Deputy Commissioner Ranade:

The Citizens Utility Board of Minnesota (CUB) respectfully submits these comments in response to the Minnesota Department of Commerce, Division of Energy Resources (Department) solicitation of stakeholder feedback, consistent with the request from the Minnesota Public Utilities Commission (Commission).¹

The Commission has requested that the Department file a report by December 1, 2020 on several matters related to Northern States Power Company d/b/a Xcel Energy's (Xcel or Company) Advanced Metering Infrastructure (AMI) and Field Area Network (FAN) projects. The Commission certified these projects pursuant to Minn. Stat. 216B.2425 in an order dated July 23, 2020.

CUB maintains that a modernized grid is the backbone necessary to advance Minnesota's energy goals, support integration of additional levels of renewables, empower consumers to make their own choices about the level and type of electric service they desire, and leverage customer-sited resources to assist in grid operation. Likewise, implementation of a grid modernization program should assist in both improving system reliability and flexibility. In that spirit, many of the investments proposed in Xcel's Integrated Distribution Plan (IDP), namely AMI and the interrelated FAN, can lay an important foundation for a dynamic, customer-centric utility approach in the future.

CUB reiterates that, notwithstanding the potential benefits from AMI and grid modernization, experience has shown that these investments are inherently complex and can be subject to cost overruns. One recent example of this issue comes from the experience of Seattle City Light, which was facing a potential \$12 million or 14 percent cost overrun in 2017. In order to stay below the roughly \$84 million set aside for the project, the utility company decided to only deliver 70 percent of what it promised on schedule and to delay

¹ These comments were prepared with assistance from Matthew McDonnell of Strategen Consulting.

the rest.² For context, a 14% cost overrun for Xcel's AMI and FAN projects could amount to roughly \$67 million in additional costs to customers.³

In addition, the customer-facing value proposition identified at the outset of a project is not often realized upon implementation. To illustrate this point, a recent report by the American Council for an Energy-Efficient Economy (ACEEE) has demonstrated that few U.S. utilities have truly captured the full range of AMI capabilities and customer-facing benefits. Of the 26 utilities with AMI in place, only one – Portland General Electric in Oregon – was engaging in all of the AMI business cases identified by ACEEE as of late 2018.⁴ These elements are further underscored by the Company's own determination that quantifiable benefits do not exceed quantifiable costs. Accordingly, the realization of qualitative, customer-facing benefits is critical to justifying an investment of this magnitude and to protecting consumers.

Indeed, central to protecting consumers is the need to adopt a sensible approach to cost recovery. With respect to cost recovery, the prime issue before the Commission is one of risk management for an investment of this magnitude and importance – both the amount of risk overall as well as the allocation of risk between the Company and customers.

As the Commission has noted in its Utility Rates Study, the use of special cost recovery mechanisms, such as the TCR rider, inherently create the potential for unproductive incentives. "The risk to incentives is especially significant when special recovery is allowed for cost categories that do not inherently pose a danger of severe financial risk; i.e., costs that are *not* always outside of the control of the utility, unpredictable or substantial. In those instances, allowing automatic recovery would also be expected to erode incentives for cost control."⁵

Furthermore, as the Commission has explained, "making certain cost categories subject to automatic recovery removes them from inclusion in the overall review of costs (those that decrease as well as those that increase) when a general rate case is ultimately filed."⁶ Indeed, it "effectively takes them 'off the table' in a rate case review and thereby constricts the Commission's rate-making authority. And while special recovery [like the TCR rider] will have the effect of dampening the magnitude of rate requests that utilities make when they do ultimately file a rate case petition, the reality is this effect merely masks the full rate implications for ratepayers."⁷

Another important issue raised by the use of TCR rider recovery for AGIS Initiative investments is one of clear accountability for tracking the costs and benefits associated with the AGIS Initiative. An approach that handles cost recovery through the TCR rider and outside of base rates enhances the risk that certain costs associated with the AGIS Initiative will be double recovered - once through the TCR rider and again through base rates. Due to the separate venues for cost recovery, there are likely to be overlapping or difficult-to-

² See David Kroman, "Facing cost overruns, City Light quietly pares smart-meter project," Crosscut, May 15, 2017, available at <https://crosscut.com/2017/05/facing-cost-overruns-city-light-quietly-pares-smart-meter-project>.

³ Estimate based on Xcel's proposed capital budget of approximately \$480 million.

⁴ See Rachel Gold, Corri Waters, and Dan York, Leveraging Advanced Metering Infrastructure to Save Energy, American Council for an Energy-Efficient Economy, January 3, 2020.

⁵ Minnesota Public Utilities Commission, Report to the Legislature: Utility Rates Study as Required by Laws of Minnesota, 2009, Chapter 110, June 2010, at 8 (Utility Rates Study), available at https://mn.gov/puc/assets/012854_tcm14-5188.pdf.

⁶ Utility Rates Study at 8.

⁷ Utility Rates Study at 8.

distinguish costs related to distribution investments. It will not always be clear which costs should be attributed to AGIS investments, recovered through a rider, and which costs should be classified as other distribution investments, recovered through a general rate case. Given this opportunity for confusion, there is a risk that certain costs will be double counted. By having to review distribution system investments across multiple filings, it makes it far more challenging to ensure accountability and avoid this potential double recovery issue. For these reasons, the Commission should embrace an approach that accounts for all AGIS Initiative costs in base rates to reduce the risk of double recovery and to better ensure that Xcel be held accountable for the cost estimates it has included in its IDP.

In sum, as the Commission evaluates the Company's request for TCR Rider recovery of the AGIS investment costs, the Commission should authorize cost recovery in a manner that adequately shares risk between the Company (i.e., the entity best positioned to manage the risk) and customers. Ideally, such an approach would permit Xcel to recover AGIS costs through base rates as determined and vetted through a comprehensive rate case proceeding. Rate case recovery, rather than TCR Rider recovery, is a better way to tie cost recovery to performance.

No matter whether the AGIS investment costs are recovered through base rates or through the TCR rider, sufficient consumer protections are still required to ensure that customers receive the benefits touted by Xcel in its IDP filing and that any unexpected cost overruns are not born wholly by customers. This need is greatly enhanced should the Commission decide to permit Xcel recovery via the TCR rider – an approach that CUB opposes. The sections that follow highlight specific consumer protection measures as well as metrics to help ensure performance and accountability through deployment of the Company's AMI and FAN.

I. Metrics

As noted by the Minnesota Department of Commerce, Division of Energy Resources (Department), in its July 23, 2020 Order in Docket No. E002/M-19-666,⁸ the Commission indicated that certification of the AMI and FAN projects was "made with the recognition . . . that all future cost recovery will be based upon the Company accomplishing Commission-approved metrics and performance evaluations for the certified projects." As a result, "[a]ny future proposals for cost recovery of investments certified in [the Commission's July 23] Order must be accompanied by a proposal for specific metrics and evaluation methods, and a detailed plan describing how the company will maximize the benefits of the AGIS [Advanced Grid Intelligence and Security] investments for ratepayers."⁹

In recognition of the impediments and challenges to maximizing advanced metering infrastructure benefits for customers, CUB maintains that appropriate metrics and evaluation methods are critical consumer safeguards.

⁸ Order Accepting Integrated Distribution Plan, Modifying Reporting Requirements, and Certifying Certain Grid Modernization Projects, Docket No. E002/M-19-666, *In the Matter of Xcel Energy's Integrated Distribution Plan and Advanced Grid Intelligence and Security Certification Request* (July 23 Order) at Point 8.

⁹ See Commission's July 23 Order at Point 10.

A. The metrics proposed by Xcel’s witnesses Gersack, Bloch, Harkness, Cardenas, Duggirala are not sufficient to determine performance of the AMI and FAN projects

CUB asserts that the Xcel’s proposed metrics, in and of themselves, are insufficient to determine performance of the AMI and FAN projects.

The metrics outlined in Attachments M1-M5 of Xcel’s IDP are primarily deployment metrics. Deployment metrics are used to measure AMI implementation performance. They generally relate to bringing AMI capabilities online within estimated costs and scheduled time frames. Though they are generally large in number, they are also fairly temporary and self-explanatory.

Tracking actual deployment costs against budgeted or forecasted costs is one of the most critical performance areas to measure. Regulators in other jurisdictions have set caps on AMI deployment cost, placing utilities at risk for any cost overruns. For example, the Hawaii Public Utilities Commission established cost recovery caps on both fixed and variable costs associated with Hawaiian Electric’s AMI deployment.¹⁰ However, these caps do not typically specify associated minimum capabilities. It may therefore be possible for a utility to simply cut back on planned functionality if it encounters cost overruns.

Other regulators are understandably interested in the status of deployments relative to planned schedules. Schedule metrics provide a reference point with which to evaluate deployment costs incurred to date, but they are also being used to help them anticipate (and perhaps accelerate) the point in time when AMI investments can be expected to begin delivering direct and indirect benefits to customers. These regulators recognize that customer payback periods can be affected by delays in the delivery of economic benefits as well as by more common concerns about the size of such benefits.

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

CUB stresses that additional process and rigorous, stakeholder-led vetting are necessary to determine a sufficient complement of performance metrics that should be established. Such a process is important not just to safeguard customers and ensure accountability on the part of Xcel in this particular AMI deployment, but also to ensure that such metrics are well aligned and harmonized with the suite of performance metrics under consideration in the Commission’s investigation to identify performance metrics in Docket No. E-002/CI-17-401.

CUB offers the following illustrative examples of potential metrics to be established, building on Xcel’s proposed AGIS progress metrics as filed on November 1, 2019 in Docket No. E002/M-19-666. The shading indicates additional, CUB-proposed metrics to inform AMI and FAN deployment and utilization.

Category	Description
Customer Outreach and Education	Survey results of customers on the adequacy and clarity of communications prior to installation of advanced meters
Installation and Deployment	Number of advanced meters installed
	Percentage of customers with advanced meters
	Percentage of FAN deployed

¹⁰ 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, filed March 25, 2019.

	Number of customers with electing to opt-out of AMI installation
	Number of calls to Customer Contact Center and meter installation vendor regarding meter installation
	Number of complaints regarding AMI installation
Post-Deployment	Percentage of customers with advanced meters that receive estimated bills
	Percentage of customers with an advanced meter that have made a complaint of inaccurate meter readings
	Survey of customer satisfaction with outage related communications
	Number of customers with an advanced meter with an active web portal account
	Number of monthly, unique visits to the web portal (My Account)
	Percentage of customers with an advanced meter with Home Area Network (HAN) functionality
	Number of customers with an advanced meter with Home Area Network (HAN) functionality
	Percentage of customers with an advanced meter with Green Button Connect My Data (CMD) functionality
	Number of customers with an advanced meter with Green Button CMD functionality
Customer Engagement	Percentage of customers with advanced meters at least 30 days that are targeted with energy savings messaging
	Percentage of low-income customers with advanced meters at least 30 days that are targeted with energy saving messaging
	Percentage of customers aware of AMI
	Percentage of low-income customers aware of AMI
	Number of customers with advanced meters that adopt an advanced rate option (e.g., TOU) tariff, expressed as a number and percentage of each by rate
	Number of organizational events attended where information on AMI presented, by region
	Demand Response: percentage participation, by class
	DER: percentage customer adoption, by class
	Storage: percentage customer adoption, by class
	Customer access to hourly or sub-hourly data
	Third-party service access to customer data
	Variety, quality, accessibility of customer data available
Customer-sited Asset Effectiveness	Demand Response: annual max MW reduction as percentage of load, by class
	Demand Response: MW enrolled as percentage load, by class
	DER: MWh generated as percentage of sales, by class
	DER: MW installed as percentage of load, by class
	Storage: MWh installed energy capacity as percentage of sales, by class
	Storage: MW installed capacity as percentage of load, by class
	Non-Wires Alternatives (NWA): MW as percentage of (peak) load
	NWA: percentage of customers participating, by class
	NWA: savings (\$) per year
	Percentage of grid supporting services provided by DER vs. traditional solutions

II. Consumer Protection Measures

Nationally, the record of utilities' AMI and smart meters deployment has been mixed – unsurprising given the level of complexity involved. Some utilities have had to interrupt their rollout 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 from smart meter projects because of change-management issues.¹¹

These false starts, cost overruns, and sub-par results underscore the need for consumer protections – both to ensure that customers are not on the hook for cost overruns due to poor project management and to guarantee realization of the promised customer benefits.

As noted above, one key element to ensuring that Xcel is incented to pursue cost reduction measures as it deploys AMI and FAN across its service territory is to recovery costs through base rates under the Company's Multi-Year Rate Plan (MYRP) – leveraging the purpose of an MYRP, to encourage cost containment during the course of the plan. Such an approach is vastly preferred to cost recovery through the TCR rider, which largely eliminates any performance incentive for the Company and unnecessarily pushes all the risk onto customers.

Even assuming cost recovery through base rates under an MYRP, there are still specific consumer protection measures that need to be put in places. These measures are even more critical should the Commission permit cost recovery through the TCR rider – an approach that CUB strongly opposes. The following sections highlight specific consumer protection measures that will help share risk between the Company and customers and ensure that customer benefits are fully realized.

A. Cost Recovery Caps

As CUB outlined in our initial comments, specific consumer protection measures must be included as conditions of any cost recovery approval. Indeed, the customer safeguard outlined therein, including fixed and variable cost recovery caps and a methodology to ensure contemporaneous delivery of benefits to customers, would be equally relevant and prudent should the Commission direct the Company to recover AGIS Initiative costs through its multi-year rate plan (MYRP).

If the Commission were to permit use of the transmission cost recovery (TCR) rider for AMI and FAN costs, there is an even greater need for consumer protections. One potential approach could operate akin to the asymmetrical capital cost-true up in the MYRP, in which ratepayers benefit from capital expense savings but do not pay for capital expenses above the baseline. The Commission approved Xcel's petition that left base rates at 2019 levels, with true-ups for 2020 actual experience.¹² The capital true-up, unlike the property tax or sales true-ups, is asymmetrical, meaning Xcel would refund to customers if it incurs lower capital related

¹¹ Anjan Asthana, Adrian Booth, and Jason Green, "Best practices in the deployment of smart grid technologies," McKinsey on Smart Grids, Summer 2010, available at https://www.mckinsey.com/~media/mckinsey/dotcom/client_service/epng/pdfs/mck%20on%20smart%20grids/mosg_bestpractices_vf.ashx.

¹² See *In re Petition of Northern States Power Company d/b/a Xcel Energy for Approval of True-Up Mechanisms*, Docket No. E-002/M-19-688, "Order Approving True-Ups and Requiring Xcel to Withdraw its Notice of Change in Rates and Interim Rate Petition," filed March 13, 2020.

revenue requirements than provided by the benchmark, but will not be allowed to collect increased revenues through the true-up if capital related revenue requirements exceed that benchmark.¹³

The Commission should implement fixed and variable cost recovery caps, as outlined below.

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 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.

As mentioned previously, cost recovery caps of this nature were also required by the Hawaii Public Utilities Commission as a condition for its approval of the Hawaiian Electric Companies' proposed grid modernization investments, including AMI.¹⁴

B. Benefits Assurance

At a minimum, the Company should be required to commit to delivering to customers the benefits that it has identified in its cost-benefit analysis.

By providing Xcel cost recovery through a rider mechanism, a significant concern is that the cost-savings associated with projects included in the rider mechanism would not be captured at the same time as the cost recovery. To address this concern, if the Commission approves cost recovery through the TCR rider, CUB recommends that the Commission establish a pass-through methodology and/or process that will provide a means by which the savings associated with the AGIS Initiative be passed on to the Company's customers in a timely fashion.

To that end, as a potential template to be adapted for the TCR rider and the AGIS Initiative, the Commission and the Company could look to a benefits pass-through methodology proposed by the Consumer Advocate and Hawaiian Electric Companies, and adopted by the Hawaii Public Utilities Commission, in Docket No. 2014-0170.¹⁵ In that proceeding, the Hawaiian Electric Companies reached agreement with the Consumer Advocate to use a rate case-centric approach to facilitate pass-through of benefits from a planned enterprise software system. The types of benefits included were: O&M expense reduction benefits, capital cost avoidance benefits, and tax cost avoidance benefits.

¹³ See *In re Petition of Northern States Power Company d/b/a Xcel Energy for Approval of True-Up Mechanisms*, Docket No. E002/M-19-688, "Petition for Approval of True-Up Mechanisms," filed November 1, 2019.

¹⁴ 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, filed March 25, 2019.

¹⁵ See *In re Hawaiian Electric Companies ERP/EAM Implementation Project*, Docket No. 2014-0170, Order No. 36166, Attachment: Consumer Advocate and Hawaiian Electric Companies' Supporting Documentation for Proposed ERP Benefits Pass-Through Methodology, filed February 20, 2019.

With respect to O&M benefits, between rate cases, O&M benefits that reduce base rates would be placed into a regulatory liability account and accumulated until the effective date of interim rates that reflect test year O&M savings benefits. The balance of the regulator liability account would be returned to customers via amortization credits to O&M expense in the next rate case. The amounts recorded in the regulatory liability account would be the higher of actual achieved O&M benefits, net of costs, or a guaranteed minimum benefits amount for the designated period preceding the test year and the months of the test year prior to when interim rates become effective. With respect to capital and tax benefits that may result, the Company could pass capital and tax benefits on to customers through annual rate adjustment mechanism filings and through future rate cases.

C. Progress Reports

CUB recommends that Xcel Energy be required to file quarterly or semi-annual reports that contain the following elements:

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 deferred costs incurred by the Company.

D. Data Access Policies to Unlock Customer Value

The deployment of AMI offers significant operational benefits for utilities and the potential for significant energy savings for consumers. A major lesson from prior state deployments of AMI is that full realization of consumer benefits from efficiency or time-shifting of usage will not occur unless consumers have convenient access to their own energy data made available by advanced meters. It is also critical that such policies are timely and consistently implemented. CUB offers that, should the Commission be inclined to grant certification of the Company's AGIS Initiative, such approval be conditioned on ensuring that consumers receive their share of the benefits of AMI – specifically, access to the energy data generated by their advanced meters, along with accompanying cost information.

As articulated in CUB's initial comments, CUB recommends that the Commission require Xcel to take certain, specific actions to ensure that Xcel's electricity customers have functional, secure access to new data-enabled technologies and services to help them save energy and money and otherwise realize value from the state's advanced metering infrastructure deployment. Namely, CUB recommends that Xcel be required to:

- Provide consumers easy access to the best available information about their energy usage through two interfaces, including both the Company's FAN and a customer's home area network;
- Provide customers and authorized third parties with access to historic billing information in a machine-readable, automated manner;
- Provide consumers and authorized third parties with rate information in standardized, machine readable formats; and

- Provide a customer authorization process that is easy for consumers to use and requires the least number of steps.¹⁶

CUB acknowledges and appreciates the Company's commitment to making Green Button Connect My Data (GBC) and the Home Area Network (HAN) accessible to customers within one year after mass deployment of AMI meters begins.¹⁷ CUB also appreciates Xcel's confirmation that the Company's HAN offering contemplates customers' ability to "bring their own device" to take advantage of HAN capabilities. CUB further notes the Company's description of an ongoing "project to make rate information available in a machine-readable electronic format" to be completed in parallel with Xcel's GBC and HAN projects. The Commission should hold Xcel to these commitments by establishing a date-certain deadline of June 2022 as a condition of some portion of cost recovery.

Finally, CUB reiterates our position that standards should be developed that recognize the need for ensuring customer privacy while also allowing for the sharing of granular data sets for research in service to public policy goals.¹⁸ The goal of adopting Open Data Access Standards is to provide energy use data in ways that are useful for third parties, while not unduly burdening utilities and associations, and protecting the privacy of individual customers. Xcel should be required to provide a set of open data access standards that would create the ability for third parties to access sets of customer energy use data, either aggregated or anonymized. However, as such standards are currently under consideration in PUC Docket 19-505, we make no additional recommendation as to their application relative to Xcel's AGIS cost recovery at this time.¹⁹

III. Conclusion and Recommendations

CUB maintains that the value of AMI is predicated upon Xcel's (and Xcel customers') realization of customer benefits. The Commission must ensure that the Company is acting timely and responsibly to achieve and credit customers with the full value promised through AMI implementation. In this spirit, we offer the following recommendations:

- The Commission should require specific, accountable metrics to provide consumer protections both during and after deployment of the AMI and FAN and should do so prior to approving any petition for cost recovery.
- Metrics should also align and be informed by, where appropriate, the performance metrics docket (E999/CI-17-410) and the annual Safety, Reliability and Service Quality docket – though not all metrics established for AMI and FAN need be incorporated in the these dockets.
- The Commission should require the imposition of fixed and variable cost recovery caps as well as the development of a methodology to ensure that benefits are contemporaneously realized by customers.
- The Commission should require Xcel to file quarterly or semi-annual reports that contain the following elements:
 - Company's plans and scope for implementation in the upcoming months and/or year;

¹⁶ CUB's Initial Comments, Attachment A at 13-14.

¹⁷ Xcel's Reply Comments, Attachment A at 25-26.

¹⁸ See Docket No. E, G-999/M-19-505.

¹⁹ CUB's Initial Comments, Attachment A at 13-14.

- 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 census block;
- The status of the FAN in comparison to the Company's plans and scope;
- Implementation status of metering and network communications headend systems in comparison to the Company's plans and scope; and
- The actual capital and deferred costs incurred by the Company.

Thank you for your consideration of our comments in this matter.

Sincerely,

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