

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

Katie Sieben	Chair
Joseph Sullivan	Vice-Chair
Valerie Means	Commissioner
Matt Schuerger	Commissioner
John Tuma	Commissioner

In the Matter of the Department’s Report on Performance Metrics and Other Conditions to Be Applied to Xcel Energy’s Projects Certified in Docket No. E-002/M-19-666

DOCKET NO. E-999/DI-20-627

In the Matter of the Petition of Northern States Power Company for Approval of Transmission Cost Recovery Rider Revenue Requirements for 2021 and Revised Adjustment Factors

DOCKET NO. E-002/M-20-680

**COMMENTS OF THE OFFICE OF
THE ATTORNEY GENERAL**

INTRODUCTION

The Office of the Attorney General—Residential Utilities Division (“OAG”) respectfully submits the following Comments in response to the Commission’s September 23, 2020 Notice of Comment Period on procedures for evaluating Xcel Energy’s (“Xcel” or “Company”) forthcoming petition to recover certain Advanced Grid Intelligence and Security (“AGIS”) investments through the Company’s Transmission Cost Recovery (“TCR”) Rider. These Comments also respond to the Minnesota Department of Commerce’s (“Department”) September 24, 2020 Notice of Stakeholder Input and Extended Comment Period regarding metrics, methods for evaluating performance, and consumer protections or other conditions that should be applied to AGIS investments recovered through the TCR Rider.

The OAG recommends that the Commission evaluate Xcel’s forthcoming TCR Rider petition through a contested-case process. If the Commission allows Xcel to recover the AGIS investments through the TCR Rider, the OAG would recommend that it require reporting on key

performance metrics, cap rider recovery based on Xcel's initial estimates, and require the Company to flow any incremental revenues or cost savings to ratepayers through the annual rider true-up process. Finally, the Commission should hold at least two public meetings to educate the public about the anticipated benefits of the AGIS initiative and to inform its decision on Xcel's TCR Rider petition.

BACKGROUND

I. XCEL INCLUDES AGIS INVESTMENTS IN BOTH ITS 2019 RATE CASE ITS 2019 INTEGRATED DISTRIBUTION PLAN. IT LATER WITHDRAWS THE RATE CASE.

On November 1, 2019, Xcel filed a rate case ("2019 rate case") and 2019 Integrated Distribution Plan ("IDP"). The filings included an AGIS initiative that would cost \$734 million between 2020 and 2029—\$582 million in capital costs and \$152 million in O&M costs.¹

Despite having a path to recovering the AGIS investments through its rate case, Xcel, in its IDP filing, also asked the Commission to certify them under Minn. Stat. § 216B.2425 as "investments . . . necessary to modernize the transmission and distribution system."² Certification is a prerequisite recovering electric distribution facility costs through a rider under Minn. Stat. § 216.16, subd. 7b.³ Xcel explained that, even though the AGIS investments would be reviewed and approved through the 2019 rate case, it was nonetheless seeking certification "so that we may complete our AGIS investments at an appropriate pace and potentially include the out-year costs in a rider."⁴

The AGIS investments were never reviewed or approved through the 2019 rate case. Instead, the Commission approved Xcel's alternative proposal to "stay out" of a rate case for

¹ Docket No. E-002/M-19-666, Order Accepting Integrated Distribution Plan, Modifying Reporting Requirements, and Certifying Certain Grid Modernization Projects at 7 (July 23, 2020) (hereinafter "IDP Order").

² Docket No. E-002/M-19-666, Xcel 2019 IDP at 4 (Nov. 1, 2019) (hereinafter "2019 IDP").

³ Xcel uses its TCR Rider to recover the costs enumerated in section 216B.16, subdivision 7b.

⁴ 2019 IDP at 20.

another year, with the Company's sales revenues, capital costs, and property taxes to be "trued up" based on 2020 actuals. Meanwhile, Xcel moved forward with its AGIS certification request in the IDP docket.

II. THE COMMISSION FINDS THAT SOME AGIS PROJECTS MEET THE CERTIFICATION THRESHOLD FOR INCLUSION IN XCEL'S TCR RIDER.

A central issue in the IDP proceeding was the meaning and effect of certification. Some parties argued that certifying the projects would imply a favorable decision as to their necessity, prudence, and reasonableness; that the record was not sufficiently developed to make this decision for such a large project; and that the Commission should therefore refer the matter for contested-case proceedings. Xcel, however, assured other parties and the Commission that certification merely served "a gate-keeping function" for grid-modernization investments to become eligible for rider recovery and that the Company would still bear the burden of proving those investments' prudence.⁵

The Commission agreed with Xcel's view of certification, clarifying that "certification does not constitute a pre-judgment of whether costs will be recovered" and "simply permits a utility to request rider recovery in the future."⁶ The Commission certified two AGIS components—Advanced Metering Infrastructure ("AMI") and Field Area Network ("FAN")—and established a process for evaluating any future petition for rider recovery of the certified projects.

III. THE COMMISSION ESTABLISHES A PROCESS FOR EVALUATING REQUESTS FOR RIDER RECOVERY OF CERTIFIED AGIS PROJECTS.

The IDP order outlines a two-pronged approach for evaluating a future petition for rider recovery of AMI and FAN costs: (1) a preliminary Commission decision on what procedure to

⁵ Docket No. E-002/M-19-666, Xcel Supp. Comments at 6 (Apr. 22, 2020).

⁶ IDP Order at 12.

use to evaluate the petition and (2) a stakeholder process, led by the Department, to investigate performance metrics and other conditions to apply to rider recovery.⁷

With respect to procedural scoping, the Commission required Xcel to file, 60 days before filing a rider-recovery petition, multiple procedural options for handling the petition, one of which must be a contested case.⁸ The Commission declared its intent to make a “procedural and scoping” decision at the outset of a future rider proceeding.⁹

With respect to conditions on recovery, the Commission requested that the Department compile, with stakeholder input, a report containing “recommendations on specific metrics, detailed methods for evaluating performance, and consumer protections or other conditions, including cost caps, that should be applied to” AMI and FAN.¹⁰ The Commission stressed that cost recovery would be contingent on Xcel’s “accomplishing Commission-approved metrics and performance evaluations for the certified projects.”¹¹

IV. XCEL PROPOSES ALLOWING STAKEHOLDERS 60 DAYS TO REVIEW AND COMMENT ON ITS PROPOSED \$450 MILLION INVESTMENT IN AMI AND FAN.

Xcel made its procedural-paths filing on August 28, 2020, in anticipation of seeking rider recovery of AMI and FAN costs in early November. The filing outlines three options: (1) a “standard miscellaneous filing process,” (2) a “technical conference,” and (3) a contested case. Each option is briefly outlined below.

⁷ The Commission also established substantive requirements for a petition for rider recovery of AGIS costs, over and above the requirements contained in prior orders. It required Xcel to discuss “mechanisms that will be employed to maximize cost reductions and minimize cost increases” and demonstrate that the Company “thoroughly considered the feasibility, costs, and benefits of alternatives, and that the proposed approach is preferable to alternatives” including “different types of the same technology.” IDP Order at 17.

⁸ *Id.*

⁹ *Id.*

¹⁰ *Id.* at 16.

¹¹ *Id.*

Under the standard miscellaneous filing option, which is Xcel’s preferred path, there would be 60 days for initial comments on the Company’s petition, followed by a 30-day reply-comment period. Xcel acknowledges that its past TCR Rider filings have “generally involved somewhat longer periods of time for initial and reply comments.”¹² But the Company suggests that its proposed comment periods are sufficient because the information it will submit with its rider petition “will largely be the same as we submitted with our certification request in November 2019,” and that stakeholders “will have had the information—and opportunity to conduct discovery related to the information—for a full year.”¹³

Xcel characterizes the second, “technical conference” option as being a “hybrid” of a notice-and-comment and contested-case process. Under this option, Xcel would host four virtual public forums between mid-October and mid-December 2020 covering key aspects of its proposed AMI and FAN investments. The proposed schedule includes a built-in discovery period from November 20 to January 15, with initial comments due on February 1, reply comments due on March 1, and supplemental reply comments due on March 15. Xcel asserts that such a process would be “more timely and productive” than a contested case and would “provide interested parties with the opportunity to fully assess the Company’s proposed investments and narrow the issues before the Commission.”¹⁴

Finally, as required by the Commission’s order, Xcel presents a contested-case option. It argues, however, that a contested case is not warranted because there are no contested material facts regarding its request for rider recovery of AMI and FAN costs. If the Commission orders a contested case, Xcel believes that an expedited schedule would be appropriate because “the

¹² Docket No. E-002/20-680, Initial Filing at 2 (Aug. 28, 2020).

¹³ *Id.*

¹⁴ *Id.* at 3.

direct testimony we likely would file in a contested case would largely be the same as that filed in support of our certification request,” though perhaps requiring supplementation to reflect the passage of time.¹⁵ Xcel again asserts as a basis for a compressed schedule that “participants in a contested case will have had access to the bulk of our direct testimony for over a year and, therefore, should be able to produce responsive testimony in a . . . shortened period of time.”¹⁶

ANALYSIS

I. THE COMMISSION SHOULD EVALUATE XCEL’S FORTHCOMING TCR RIDER FILING USING A ROBUST PROCESS CONSISTENT WITH THE EXTRAORDINARY SIZE AND IMPORTANCE OF THE INVESTMENTS INVOLVED.

In certifying Xcel’s AMI and FAN investments, the Commission acknowledged that the hard work of reviewing these investments for prudence and rate recoverability had not yet been done. The Commission directed Xcel to provide supplemental information in any rider-recovery petition and to file procedural options for evaluating the petition, with a contested case being a mandatory option. Xcel’s procedural filing presents three options, including a contested case. But the Company recommends that the Commission order a notice-and-comment process that would allow stakeholders only 60 days to review its petition. The Commission should reject this proposal and instead evaluate Xcel’s forthcoming rider petition using a thorough process suited to the extraordinary size and importance of these investments.

TCR Rider dockets normally involve a lengthy evaluation process with numerous rounds of comments. Over the past six TCR dockets, the average time between the filing of Xcel’s petition and the filing of the first stakeholder comment was 134 days, with a minimum period of 91 days. The average time between the filing of the first comment and the last comment was 168 days, with a minimum of 55 days. And the average time between the filing of the petition and

¹⁵ *Id.* at 8.

¹⁶ *Id.*

the Commission order was 466 days, with a minimum of 226 days. Importantly, these numbers do not reflect the time required to obtain a certificate of need for large energy facilities, a process which often involves a contested-case proceeding.

The proposed AMI and FAN projects represent a total capital investment of more than \$450 million¹⁷ and are integral to Xcel's plans for transforming its system to meet the changing needs of electricity consumers. Their size and importance thus equal or exceed that of many large transmission-line projects that have been included in the TCR Rider in the past. The process for evaluating AMI and FAN should be comparably rigorous to the usual TCR process, and allow ample time for stakeholders to review Xcel's petition after it is filed.

Xcel argues that it supplied the information needed to analyze the prudence of AMI and FAN in its 2019 IDP proceeding and suggests that stakeholders should already have reviewed their prudence. But the IDP proceeding was focused on a different issue—certification—and expressly did not consider the prudence or recoverability of these investments. Indeed, Xcel itself argued that certification merely served a gatekeeping function and did not require a detailed review for prudence or cost recovery. The Company now suggests that regulators should be poring over the AMI and FAN investments and conducting discovery before Xcel has made a formal request to recover their costs. The idea that parties would conduct discovery on a nonexistent cost-recovery petition is absurd. Stakeholders will need adequate time, after Xcel files its TCR Rider petition, to review these substantial investments and ensure that they are reasonable and prudent.

Beyond providing sufficient time for stakeholder review, the process that the Commission establishes should be robust enough to develop the facts and winnow the issues that

¹⁷ 2019 IDP at 14 tbl.2.

it must resolve. An augmented notice-and-comment process, such as Xcel's second option, could potentially meet this need. But because the issues in this case are likely to involve contested material facts, the wiser course of action is to refer the matter for contested-case proceedings.

Xcel has yet to file its TCR Rider petition, so it is impossible to know with precision what disputed facts it might involve. But the Commission will likely need to resolve, at minimum, the following issues:

- Is rider recovery of the requested AMI and FAN costs in the public interest?
 - Will the proposed AMI and FAN investments achieve their goals at the lowest feasible and prudent cost to ratepayers?¹⁸
 - How do the AMI and FAN investments fit within and relate to the larger AGIS initiative?¹⁹
 - Are all proposed components necessary?
 - Are better alternatives available and did Xcel make reasonable efforts to find them?
 - Has Xcel taken sufficient concrete steps to ensure that the purported benefits will be realized?
 - Are any of the costs proposed to be recovered through the rider already being recovered through base rates or another mechanism?
 - Has an appropriate amount of AMI costs been assigned to NSP-MN from PSCo?²⁰
- What rate of return is appropriate for rider recovery of these investments?
- What are the appropriate performance metrics to apply to these investments?
- What other ratepayer protections, such as cost caps, are in the public interest?
- What rate design is appropriate for the rider?

¹⁸ See Minn. Stat. § 216B.16, subd. 7b(d).

¹⁹ See Docket No. E-002/M-17-797, Order Authorizing Rider Recovery, Setting Return on Equity, and Setting Filing Requirements at 13 (Sept. 27, 2019) (ordering Xcel, if and when it seeks TCR Rider recovery of AGIS investments, to provide, among other things, information on “[i]nterrelation and interdependencies with other existing or future investments, including overlapping costs: scope, amount, [and] timing”).

²⁰ See Docket No. E,G-002/AI-20-514, Annual Report at 7–8 (May 29, 2020) (discussing “new allocation method” for AMI head-end costs incurred by Xcel’s Colorado operating company).

Because at least some of these issues are likely to involve disputed facts, the most prudent course of action would be to refer this matter for contested-case proceedings.

II. PERFORMANCE METRICS, COST CAPS, AND OTHER CONDITIONS ON RIDER RECOVERY

On September 24, the Department of Commerce issued a notice seeking stakeholder input to inform its forthcoming report on metrics and other conditions to be applied to rider recovery of AMI and FAN costs.²¹ The Department's notice outlines a number of topics related to metrics, methods of evaluating performance, service offerings, and consumer protections.

The OAG does not address every topic that the Department identifies but instead focuses on areas where the OAG believes it can provide a helpful perspective. At a high level, the OAG recommends the Commission do the following:

- The Commission should, at minimum, require Xcel to track and report metrics that capture the quantifiable benefits that the Company has identified for AMI. This will allow the Commission and stakeholders to verify that the promised benefits are materializing. The mere requirement to report on these and other metrics will likely have a positive impact on Xcel's performance.
- To further protect ratepayers, the Commission should cap rider recovery based on Xcel's initial estimate of AMI and FAN costs, just as it does for other TCR Rider projects. In addition, the Commission should require Xcel to pass through to ratepayers any incremental revenues and cost savings resulting from its AGIS investments.
- Finally, the Commission should hold at least two public meetings to educate the public about the anticipated benefits of AMI and FAN and gather feedback to inform its decision on Xcel's rider petition.

²¹ See Docket No. E-999/DI-20-627, Department's Notice of Solicitation of Stakeholder Input and Extended Comment Period (Sept. 24, 2020) (hereinafter "Department Notice").

A. The Commission Should Require Xcel to Report, at Minimum, Metrics that Capture the Quantifiable Benefits of AMI.

The Department seeks comments on what metrics to use to evaluate AMI and FAN investments.²² As the Commission’s IDP order recognizes, it will be important to establish robust metrics for these substantial investments. Xcel has touted numerous benefits of its AGIS initiative, some that are quantifiable and some that are not. The Commission should establish metrics that hold the Company accountable for these claimed benefits rather than allow the Company to increase its rate base and simply assume that benefits will follow.

In testimony filed with its last rate case, and attached to its IDP, Xcel identified four categories of AMI benefits: capital benefits, O&M benefits, other quantifiable benefits, and unquantifiable benefits.²³ At a minimum, the Commission should require Xcel to report metrics that measure the quantifiable benefits the Company identified. For example, under the category of quantifiable capital benefits, Xcel stated that AMI will improve distribution management efficiency by providing “a wealth of information about the workings of the distribution system” that will enable the Company to “prioritize areas for investments in tap, transformer, and secondary wire replacement” and “determin[e] the optimal transformer for replacement transformers.”²⁴ Xcel estimates that AMI meters will provide a one percent reduction in capital expenditures for Asset Health and Reliability projects and Capacity projects. The Commission should therefore require Xcel to report its annual capital expenditures for Asset Health and

²² Department Notice at 3–4.

²³ 2019 IDP, attach. M2 at 55. Xcel does not project that FAN will have benefits in its own right, but it is necessary to support AMI. *Id.*, attach. M1 at 163–64.

²⁴ *Id.*, attach. M2 at 60.

Reliability projects and Capital projects, with a goal of a one percent reduction in these expenditures.²⁵

The Department also asks *when* metrics should 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” or based on some other triggering event.²⁶ The OAG recommends that the Commission establish the most essential metrics, including those that measure AMI’s quantifiable benefits, in any order approving recovery of AMI or FAN costs. Establishing these initial metrics would not preclude adding new metrics, eliminating metrics, or modifying goals at a later date. But Xcel should start tracking and reporting data on essential metrics immediately to begin establishing a baseline.

Finally, the Department asks how AMI and FAN metrics should relate to metrics established in other dockets.²⁷ The metrics established for AMI, although they may relate to metrics that the Commission has established elsewhere, are not dependent on those other metrics because their purpose is different. For instance, in Docket No. E-002/CI-17-401, the Commission has established high-level performance metrics for Xcel. Some of these metrics, such as rates per kWh and average monthly bills, measure affordability.²⁸ These affordability metrics will indirectly capture any cost savings associated with AMI. But the specific, quantifiable benefits that Xcel identified for its AMI investments should also be measured separately to give the Commission and stakeholders a window into the performance of these substantial investments.

²⁵ Fresh Energy lists the full set of metrics based on Xcel’s identified benefits. *See* Docket No. E-999/DI-20-627, Fresh Energy Comments, attach. A at 1. The OAG also generally supports the other metrics that Fresh Energy lists.

²⁶ Department Notice at 3.

²⁷ *Id.* at 4.

²⁸ *See In the Matter of a Commission Investigation to Identify Performance Metrics, and Potentially, Incentives for Xcel Energy’s Electric Utility Operation*, Docket No. E-002/CI-17-401, Order Establishing Performance Metrics (Sept. 18, 2019).

B. The Commission Should Evaluate AMI and FAN Performance by Setting Reporting Requirements, Establishing Baselines, and Using the Baselines to Inform Performance Goals.

The Department seeks comments on what methods should be used to evaluate Xcel's performance under any metrics the Commission establishes.²⁹ The Commission should begin by requiring Xcel to periodically report its performance under the metrics the Commission establishes. Once Xcel has reported enough performance data to establish a baseline for a metric, the Commission can use this baseline to establish a goal against which to judge Xcel's future performance.

The first step in evaluating Xcel's performance will be to establish reporting requirements. The OAG believes that an annual Xcel report followed by a Commission evaluation makes the most sense, and agrees with Fresh Energy's suggestion that quarterly reporting may be appropriate for metrics related to project implementation (e.g., number of smart meters installed, percentage of FAN deployed, capital spend vs. budget).³⁰ Quarterly reports would not require Commission action unless they reveal an issue that needs addressing.³¹

Xcel should begin reporting metric data immediately to start establishing a baseline for future evaluation. Initially, metrics that measure the benefits of AMI may not show any benefit, since Xcel will not realize most of these benefits until AMI is fully rolled out. For example, Xcel expects AMI to drive down meter-reading costs. Until AMI is implemented, however, Xcel's performance cannot be judged based on meter-reading costs, except to the extent that partial implementation will reduce these costs. Xcel should nonetheless begin reporting meter-

²⁹ Department Notice at 4–6.

³⁰ See Fresh Energy Comments at 8.

³¹ See *id.*

reading costs immediately. Requiring the Company to report this and other data in the near term will allow the Commission to begin establishing baselines.

For some metrics, it may make sense to use Xcel's historical performance averaged over a three- or five-year period as a baseline. For example, assuming that AMI will begin reducing meter-reading costs in 2024, a 2021–2023 annual average of meter-reading costs could be used as the baseline. Using an average would help to smooth any anomalies and ensure that the baseline is representative. In addition to the baseline, any upward or downward trend in performance should inform goal-setting.

C. To Protect Ratepayers, the Commission Should Require Xcel to Report Performance Data, Cap Rider Recovery Based on Initial Estimates, and Require Xcel to Flow Incremental Revenue and Cost Savings to Ratepayers.

The final category in the Department's notice pertains to consumer protections that should be considered in conjunction with a petition for rider recovery of AMI and FAN costs. Rider recovery shifts risks from the utility to its ratepayers and lessens the utility's incentive to contain costs. Because of this, the Commission should impose conditions on AMI and FAN cost recovery to protect ratepayers. First, the Commission should require Xcel to report key metrics immediately, as discussed above. Second, the Commission should cap rider recovery based on the cost estimates Xcel provided with its 2019 IDP. Finally, the Commission should require Xcel to maximize the revenues and cost savings from its AGIS investments and to flow the incremental revenues and savings to ratepayers expeditiously.

1. The Commission Should Require Metric Reporting but Should Not Attach Incentives or Penalties to Xcel's Performance Yet.

The OAG does not believe that establishing performance incentives or penalties is necessary or wise at this time. The mere requirement to track and report various metrics will likely have a positive impact on Xcel's performance, and establishing incentives too soon would

therefore risk overpaying for performance that could have been obtained without any incentives. Instead, the Commission should follow the steps in its *Order Establishing Performance-Incentive Mechanism Process*³² and consider an incentive mechanism only after establishing metrics and performance goals. Establishing a goal will in many cases require baseline data, which may take time to gather. The OAG recommends that the Commission revisit this question after Xcel has reported at least a year's worth of performance data.

If the Commission does consider awarding incentives for good performance, it should also consider imposing penalties for poor performance. A mechanism that only awards incentives would be inequitable because the AMI and FAN investments already represent a net cost to ratepayers before factoring in the cost of any incentives.³³ In other words, ratepayers can expect to pay more for AMI and FAN than they will receive in financial benefits, and adding incentive payments would make them even less cost-effective. A combined incentive/penalty mechanism would apportion risk more equitably between ratepayers and shareholders and would drive the desired level of performance more effectively than would an incentive alone.

One way that the Commission could implement an incentive/penalty mechanism in the context of the TCR Rider is to establish a base-level rate of return for rider investments that would be decreased for performance below a set goal and increased for performance substantially above the goal, up to some maximum return. The maximum return could be the Company's authorized rate of return, and the base return could be some lower rate deemed reasonable for rider projects because of their lower investment risk, such as the Company's weighted cost of debt. As the OAG has stated, though, the Commission preferably should not

³² See Docket No. E-002/CI-17-401, Order Establishing Performance-Incentive Mechanism Process at 5, 11 (Jan. 8, 2019) (adopting OAG's recommended PIM design process).

³³ 2019 IDP, attach. M1 at 165 tbl.10 (showing benefit-to-cost ratio for AMI of 0.83)

establish either rewards or penalties without having a good sense of baseline performance data and trends.

2. The Commission Should Cap Rider Recovery of AMI and FAN Costs at the Estimates Provided in Xcel's 2019 IDP.

The Department requests comment on what, if any, cost-cap provisions should be established beyond the usual TCR Rider cap, which limits rider recovery to the cost estimate provided for a project when it is first included in the rider.³⁴ The Department also asks, specifically, whether the Commission should establish variable O&M cost-recovery caps for the AMI and FAN projects, set at the lower of the variable O&M costs that Xcel actually incurs costs or variable O&M costs as proposed in its 2019 IDP.³⁵

The Commission adopted the existing TCR Rider cap based on concerns that rider recovery gives utilities insufficient incentives to minimize costs.³⁶ Unlike base rates, which do not vary between rate cases, riders use an annual “true-up” process wherein surcharges are adjusted up down depending on whether a utility over- or underrecovered its costs during the previous year. The utility thus has less incentive to contain the costs of projects being recovered through riders, since—without a cap on recovery—any overruns can be recovered expeditiously. This same rationale for capping recovery of traditional TCR projects applies with equal force to AMI and FAN because of their large cost.

If the Commission allows Xcel to recover AMI and FAN costs through the TCR Rider, it should cap rider recovery at Xcel's initial estimates to encourage fiscal discipline and align the

³⁴ Department Notice at 6.

³⁵ *Id.*

³⁶ See Docket No. E-002/M-09-1048, Order Approving 2010 TCR Project Eligibility and Rider, 2009 TCR Tracker Report, and TCR Rate Factors at 6 (Apr. 27 2010) (imposing cap on TCR Rider recovery while referencing recent order imposing similar cap on RES rider); Docket No. E-002/M-09-1083, Order Approving 2010 RES Rider and 2009 RES Tracker Report, Establishing 2010 RES Charge, and Requiring Revised Tariff at 4–5 (Apr. 22, 2010) (adopting Department recommendation to impose cap on RES rider recovery out of concerns about cost overruns).

Company's incentives with ratepayer interests. The cap should be applied separately to AMI and FAN so that overruns on one project cannot be obscured by combining the budgets for the two projects. The Commission should also consider applying separate caps to rider recovery of capital costs and variable O&M costs for each project.³⁷ The rationale for doing so would be similar to the rationale for applying the cap separately to each project—to hold the Company to its high-level estimates for each category and to incentivize it to control both types of costs.

3. The Commission Should Require Xcel to Pass Through to Ratepayers the Incremental Revenues and Cost Savings from AGIS Investments.

The Department asks whether the Commission should require all revenues from the AGIS initiative to flow to ratepayers—for example, by establishing a pass-through mechanism for AGIS-related revenues and cost savings.³⁸ The OAG agrees that all revenues and cost savings from AMI and FAN should flow to ratepayers expeditiously.

AMI and FAN investments are expected to drive certain types of cost savings, which Xcel identified in the cost-benefit analysis it filed with the 2019 IDP. Xcel should be required to track and report these cost savings through metrics, as discussed earlier in these comments. When the promised savings materialize, they could be flowed to ratepayers as a credit through the annual TCR Rider true-up process.

AGIS initiatives like AMI and FAN are not designed to bring in new ratepayer revenue, but there may be ways that Xcel can monetize these investments beyond rates. For example, there may be opportunities for Xcel to partner with other utilities and municipalities, share use of the FAN, and thereby reduce its net cost to Xcel's ratepayers.³⁹ The Commission should ensure

³⁷ See Department Notice at 6.

³⁸ *Id.*

³⁹ See Aclara, Four Trends in Utility Field Area Networks You Need to Know, <https://blog.aclara.com/four-trends-in-utility-field-area-networks-you-need-to-know/> (accessed Oct. 13, 2020).

that Xcel both pursues opportunities to earn additional revenue from AGIS technologies and credits any revenue to ratepayers in a timely fashion. The additional revenue could be flowed to ratepayers through the annual rider true-up process.

D. The Commission Should Hold Public Hearings to Inform Its Decision.

Finally, the Department asks how public input should be considered and whether Xcel should be required to hold public meetings on its AGIS initiatives.⁴⁰

Regardless of whether the Commission refers Xcel's TCR Rider petition for contested-case proceedings, it should ask the Office of Administrative Hearings to assign an administrative law judge ("ALJ") to hold at least two public hearings on the petition. The hearing should be publicized in a similar manner to rate-case public hearings to maximize the public's opportunity to participate. The ALJ could then summarize the public comments, both oral and written, for the Commission's consideration.

Giving the public a meaningful chance to learn about and provide feedback on the AGIS investments is advisable for several reasons. First, these are important and expensive investments. The Commission has held public hearings in many rate cases where a utility's total revenue deficiency was smaller than just these two investments. Second, the AGIS investments are presumably being made for ratepayers' benefit, and thus far, the quantifiable benefits appear to be outweighed by the costs. Xcel could take the opportunity that public hearings would afford to make the case to ratepayers that the intangible benefits of these investments are worth their cost. Finally, public input may be useful in shaping the final contours of these investments, as well as the conditions placed on rider recovery.

⁴⁰ Department Notice at 6.

CONCLUSION

For the foregoing reasons, the Commission should take the following actions:

1. Refer Xcel's forthcoming TCR Rider petition for contested-case proceedings;
2. Hold at least two public hearings regardless of whether it orders a contested case;
and
3. If the Commission grants rider recovery of any AGIS investments,
 - a. require Xcel to report on metrics that capture the quantifiable benefits it has identified for AMI,
 - b. cap rider recovery of AGIS investments based on Xcel's initial estimates,
and
 - c. require the Company to flow incremental revenues and cost savings to ratepayers through the annual true-up process.

Dated: October 16, 2020

Respectfully submitted,

KEITH ELLISON
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/s/ Peter G. Scholtz

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October 16, 2020

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

Re: *In the Matter of the Department's Report on Performance Metrics and Other Conditions to Be Applied to Xcel Energy's Projects Certified in Docket No. E-002/M-19-666*
MPUC Docket No. E-999/DI-20-627

In the Matter of the Petition of Northern States Power Company for Approval of Transmission Cost Recovery Rider Revenue Requirements for 2021 and Revised Adjustment Factors
MPUC Docket No. E-002/M-20-680

Dear Mr. Seuffert:

Enclosed and e-filed in the above-referenced matter please find Comments of the Minnesota Office of the Attorney General—Residential Utilities Division.

By copy of this letter all parties have been served. A Certificate of Service is also enclosed.

Sincerely,

/s/ **Peter G. Scholtz**

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Enclosure

CERTIFICATE OF SERVICE

Re: *In the Matter of the Department's Report on Performance Metrics and Other Conditions to Be Applied to Xcel Energy's Projects Certified in Docket No. E-002/M-19-666*
MPUC Docket No. E-999/DI-20-627

In the Matter of the Petition of Northern States Power Company for Approval of Transmission Cost Recovery Rider Revenue Requirements for 2021 and Revised Adjustment Factors
MPUC Docket No. E-002/M-20-680

I, JUDY SIGAL, hereby certify that on the 16th day of October, 2020, I e-filed with eDockets *Comments of the Minnesota Office of the Attorney General—Residential Utilities Division* and served a true and correct copy of the same upon all parties listed on the attached service list by e-mail, electronic submission, and/or United States Mail with postage prepaid, and deposited the same in a U.S. Post Office mail receptacle in the City of St. Paul, Minnesota.

/s/ Judy Sigal
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Susan	Ludwig	sludwig@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_20-680_M-20-680
Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_20-680_M-20-680
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_20-680_M-20-680
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Samuel	Mason	smason@beltramelectric.com	Beltrami Electric Cooperative, Inc.	4111 Technology Dr. NW PO Box 488 Bemidji, MN 56619-0488	Electronic Service	No	OFF_SL_20-680_M-20-680
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Dave	McNary	David.McNary@hennepin.us	Hennepin County DES	701 Fourth Ave S Ste 700 Minneapolis, MN 55415-1842	Electronic Service	No	OFF_SL_20-680_M-20-680
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Joseph	Meyer	joseph.meyer@ag.state.mn.us	Office of the Attorney General-RUD	Bremer Tower, Suite 1400 445 Minnesota Street St Paul, MN 55101-2131	Electronic Service	No	OFF_SL_20-680_M-20-680
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	OFF_SL_20-680_M-20-680
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Mary Beth	Peranteau	mperanteau@wheelerlaw.com	Wheeler Van Sickle & Anderson SC	44 E. Mifflin Street, 10th Floor Madison, WI 53703	Electronic Service	No	OFF_SL_20-680_M-20-680
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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_20-680_M-20-680
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Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-680_M-20-680
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Larry L.	Schedin	Larry@LLSResources.com	LLS Resources, LLC	332 Minnesota St, Ste W1390 St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-680_M-20-680
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Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-680_M-20-680
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David	Shaffer	shaff081@gmail.com	Minnesota Solar Energy Industries Project	1005 Fairmount Ave Saint Paul, MN 55105	Electronic Service	No	OFF_SL_20-680_M-20-680
Patricia F	Sharkey	pscharkey@environmentalallawcounsel.com	Midwest Cogeneration Association.	180 N LaSalle St Ste 3700 Chicago, IL 60601	Electronic Service	No	OFF_SL_20-680_M-20-680
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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