

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

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

January 6, 2023

In the Matter of a Commission	)	
Investigation to Identify and Develop	)	
Performance Metrics and, Potentially,	)	Docket No. E002/CI-17-401
Incentives for Xcel Energy's Electric	)	
Utility Operations	)	
	)	
In the Matter of Xcel Energy's Annual	)	
Report on Safety, Reliability, and Service	)	Docket No. E002/M-20-406
Quality and Petition for Approval of	)	
Electric Reliability Standards	)	

I. Introduction and Summary

The Environmental Law & Policy Center (ELPC) and Vote Solar (jointly, "ELPC/VS") respectfully submit these initial comments in response to the Minnesota Public Utilities Commission's ("Commission") December 2, 2022, Notice of Comment Period in Docket Numbers E-002/CI-17-401 and E002/M-20-406. The Commission requested feedback on the question of what action should the Commission take on the Locational Reliability, Equity – Service Quality and Equity – Reliability metrics and Xcel Energy's ("Xcel" or "the Company") associated map.

ELPC/VS appreciate the Commission's initiative to take the next steps in developing metrics to measure and ensure equitable outcomes for reliability and service quality for all customers. ELPC/VS have been directly engaged in supporting this initiative since 2018 and across numerous dockets and look forward to participating in the next stages of the process

The Environmental Law & Policy Center (ELPC) is a Midwest-based, not-for-profit public interest environmental organization that works to achieve cleaner air, advance clean renewable energy and energy efficiency resources, improve environmental quality, protect clean water, and preserve natural resources in Minnesota and throughout the region. ELPC has an interest in equitable, transparent and forward-looking distribution system planning that promotes the development of local, clean, distributed energy resources while maintaining affordable rates.

Vote Solar (VS) is an independent 501(c)3 nonprofit working to repower the U.S. with clean energy by making solar power more accessible and affordable through effective policy advocacy. Vote Solar seeks to promote the development of solar at every scale, from distributed rooftop solar to large utility-scale plants. Vote Solar has over 90,000 members nationally, including over 2,500 members in Minnesota. Vote Solar is not a trade organization nor does it have corporate members.

In these Comments, ELPC/VS review the history of the development of a locational reliability/equity metric by the Commission, provide some context on similar efforts being considered or approved in other states in the Midwest, and respond to the specific questions posed by the Commission. In response to the questions, ELPC/VS also offer specific suggestions for supplemental data collection/reporting and offer a concrete example of a potential methodology for calculating a metric.

II. Background

Despite progress in developing a map/visualization, there has not been a systematic approach to understanding to what extent or whether environmental justice communities in Minnesota have been disproportionately impacted by poor reliability, underinvestment in distribution systems, and/or other dimensions of distribution system performance such as lack of grid access/hosting capacity or low power quality. This fundamental analysis is badly needed to understand, measure, and advance grid equity. Valuable information measuring and reporting on grid equity can then be used to inform the utility's strategic outlook and plans, capital investments, distribution system operations decisions, and the Commission's evaluation of those proposals.

Thus, it is important to remember that the current effort to establish a locational reliability/equity metric is only one part of Xcel's broader duty to provide just, reasonable, and equitable electricity service. Equity considerations must be part of each utility planning, investment, and operating process, not a separate, siloed process.

Moreover, ELPC/VS acknowledge that this locational reliability/equity metrics effort is only part of broader steps the Commission has taken to advance consideration of equity in its decision-making, including initiating an Energy Equity Docket¹ through the Order approving Xcel's most recent Integrated Resource Plan.² Xcel's pending General Rate Case (Docket 21-630) presents another critical opportunity for the Commission to incorporate considerations of equity and Energy Justice into its review of Xcel's proposed rates and services.

¹ Minnesota Public Utilities Commission, Notice of Docket Opening, In the Matter of Efforts to Advance Workforce Diversity, Inclusive Participation, and Equitable Access to Utility Services for Xcel Energy, MPUC Docket No. E002/M-22-266, June 21, 2022.

² Order Approving Plan with Modifications, Minnesota Public Utilities Commission, Docket No. E002/RP-19-368, Apr. 15, 2022.

In the Commission's September 18, 2019, Order in the Performance Metrics docket,³ the Commission acknowledged the importance of equity in establishing customer service metrics but deferred establishing a metric to allow stakeholders and the Company to develop the appropriate metrics more fully. In the ordering paragraphs, the Commission identified future metrics to be developed, including paragraphs 1(b)ii and 2(c) iv. Specifically, ordering paragraph 1(b)(ii) identified future **reliability** metrics to be developed:

ii. Future metrics:

1. Momentary Average Interruption Frequency Index (MAIFI)
2. Locational reliability
3. Power quality
4. Equity – reliability by geography, income, or other relevant benchmarks.⁴

Likewise, ordering paragraph 2(c)(iv) specified future **customer service** metrics to be developed, including:

- iv. Equity metric – customer service quality by geography, income, or other relevant benchmarks.⁵

As noted, the Commission directed stakeholders to work together to develop equity metrics for both customer service and reliability.

Xcel and stakeholders are directed to determine an appropriate method to measure and report on equity, which could include geography, income, or other benchmarks relevant to reliability.⁶

The action on this topic moved to the following Xcel annual Safety, Reliability, and Service Quality (SRSQ) filing, which consists of annual dockets in which the Company reports its previous year's reliability and service quality data, broken down by region. The Commission then approves the report or can identify areas where improvement is needed.

The Commission's January 28, 2020 Order on Xcel's 2019 SRSQ moved development of the "future metrics" to Xcel's following SRSQ, which became Docket No. E002/M-20-406.

Since moving the locational reliability and equity metrics discussions to the SRSQ, the MPUC Staff and the Company have hosted technical workshops focused on developing a map to visualize data at a level that would make an equity analysis available. To our knowledge, Xcel was the first utility in the country to aggregate and report reliability data at the census block

³ Order Establishing Performance Metrics, Minnesota Public Utilities Commission, Docket No. E-002/CI-17-401, September 18, 2019.

⁴ *Ibid.* pg. 12.

⁵ *Ibid.*, pg. 13.

⁶ *Ibid.*, pg. 7.

group level. There have now been three iterations of the map reported in compliance filings and a subsequent SRSQ:

- Illustrative Map – showed a subset of areas around the Twin Cities in the first version.⁷
- The first version of the map for the entire service territory was provided in an updated compliance filing letter to the 2020 SRSQ docket using data from calendar year 2020.⁸
- In the April 1, 2022 *Annual Report and Petition*, reporting 2021 reliability and service quality data seeking approval of its 2021 SRSQ report,⁹ Xcel provided an updated map using 2021 data.¹⁰

ELPC/VS have supported taking the next step to move from data collection and mapping of locational reliability/equity to developing metrics that can be reported, incorporated into the Company's decision-making processes, and used by the Commission to support evaluation of the Company's performance. In the lead-up to the Commission's consideration of Xcel's 2020 Safety, Reliability, and Service Quality report (Docket No. 21-237), ELPC/VS wrote a letter encouraging the Commission to begin developing the locational reliability/equity metric.¹¹ The Commission declined to accept our recommendation in that docket, noting that this was taking place in other contexts.

As detailed in the Notice of Comment Period, this issue has been discussed and or filed on in a variety of dockets since being introduced in the performance metrics docket (17-401) in 2019. Compliance filings with the interactive map have been provided in multiple SRSQ dockets; it has been raised by stakeholders in two distribution system planning dockets; and it has been at least alluded to in Commission's Energy Equity docket. Given the nature and intended future use of performance metrics to consolidate utility performance on a broad range of metrics, ELPC/VS encourage the Commission to bring the locational reliability/equity metrics back into the performance metrics docket. However, in order to be effective, the locational reliability/equity analysis should also be fully incorporated into business processes around planning, investment, and operations that will ultimately drive outcomes. As such, Xcel should explain in its distribution system plans and rate case investment proposals how its plans and proposals achieve the locational reliability/equity metric goals.

III. Context on Minnesota's Leadership in Locational Reliability/Equity Analysis

In this section, Joint Commentors share experience working on this issue in other states in the Midwest. To our knowledge, Minnesota leads the way nationally in collecting reliability data

⁷ Xcel Energy, Compliance Filing – Interactive Map Update 2019 Electric Service Quality Report, Minnesota Public Utilities Commission, Docket Nos E-002/M-20-406, E002/M-21-237, and E002/CI-17-401, October 1, 2021

⁸ Xcel Energy, Letter – Interactive Map Update, Electric Service Quality Report, Minnesota Public Utilities Commission, Docket Nos. E002/M-20-406, E002/M-21-237, and E002/CI-17-401, December 15, 2021.

⁹ Xcel Energy, Annual Report and Petition, Minnesota Public Utilities Commission, Docket No. 22-162, April 1, 2022.

¹⁰ Map accessible at:

<https://xeago.maps.arcgis.com/apps/webappviewer/index.html?id=6b87f4d407864b939bcea05aad05bdd1>

¹¹ Environmental Law & Policy Center and Vote Solar, Letter to the Commission, Minnesota Public Utilities Commission Docket No. E002/M-21-237 In the Matter of Xcel Energy's annual report on safety, reliability, and service quality for 2020; and petition for approval of electric reliability standards for 2021, January 21, 2022

using census geographies and visualizing the data on a map. However, in the intervening years, other states in the region have advanced further in measuring locational reliability and equity and improving service for the effort toward the goal of ensuring equitable service. They have taken the next step of not only collecting the data but also are now working to incorporate measures of equity into business processes around planning, investment, and operations that will ultimately drive outcomes. It is important for Xcel to also begin applying this reliability and equity data to its business processes so that Minnesota can maintain its leadership position.

A. DTE Electric Approach to Equity in Distribution System Planning

Section 2.2 of DTE's 2022 Distribution Grid Plan (DGP)¹² explains the Company's approach to energy and environmental justice. The Company explains that it has established a cross-organization Energy and Environmental Justice Committee "to explore ways the company may be able to better serve customers living in highly impacted communities as defined by the Michigan Environmental Justice Screen (MIEJScreen) tool."¹³ DTE's 2021 Distribution Grid Plan further explains that one of the Company's goals is "to incorporate more equity considerations in our grid modernization and clean energy efforts."¹⁴ In addition, the Plan indicates that in the context of the Distribution Grid Plan the Company will "focus on energy justice as it relates to the long-term planning of the grid to meet the evolving needs of all our customers equitably."¹⁵

DTE's Distribution Grid Plan explains an approach to measuring reliability in environmental justice communities and incorporating the EJ reliability analysis into a metric that will be proposed in its upcoming performance based ratemaking plan. Section 2.2.2: Actions of the Distribution Grid Plan describes the Company's commitment to incorporating equity into distribution system operations and strategic planning processes. The Company commits to incorporating equity by:

1. addressing areas of poor service in highly impacted communities
2. incorporating equity into its strategic capital spending decision-making through the Global Prioritization Model, and
3. ensuring that the trouble and storm restoration strategies are optimized to prioritize highly impacted communities.

Unfortunately, DTE has not yet followed through on its promise to develop this metric and did not include it in its recently concluded rate case. The Michigan Public Service Commission realized as much and ordered several steps to move the process forward, including a process for incorporating environmental justice into its decision-making processes:

The Commission first would like to thank the parties for their extensive work on these important issues. Notably, the Energy Burden Survey brings forth a wealth of information which will be important to consider going forward. See, Exhibit DAO-3. The

¹² DTE Exhibit A-23, Schedule M1, *DTE 2021 Distribution Grid Plan*.

¹³ DGP, pg. 34 of 568.

¹⁴ DGP, pg. 34 of 568.

¹⁵ DGP, pg. 34 of 568.

Commission also agrees that the company's GPM does not adequately incorporate equity and environmental justice considerations. As noted above, however, DTE Electric has indicated its intention to develop and file a distribution-related environmental justice plan based upon the MiEJScreen tool and a geographic view of its reliability data in either its next DGP or general rate case, which will "address the most impacted communities who also experience lower reliability." 4 Tr 513; see also, 4 Tr 516, Exhibit A-12, Schedule M1, Section 2.2, pp. 26-29. Similarly, the company noted that it "will complete analysis of the reliability of communities identified by the MiEJScreen tool" and "plans to collaborate with the [Commission] Staff to develop protocols for reporting information on reliability, outages, and storm response on a more granular level in response to the [Commission's] March 2, 2022 order in Case No. U-21122." 4 Tr 513. As it did in the September 8 order, the Commission "acknowledges and commends DTE Electric for the inclusion of environmental justice and equity in its distribution plan." September 8 order, p. 73. More work is necessary, however. As the Staff stated, "[t]hough the Company intends for its investments to lead to equitable energy infrastructure, only thorough analyses of the results can determine whether it truly yields equitable results." Staff's initial brief, p. 283; see also, September 8 order, p. 73. As such, the Commission will continue to hold DTE Electric to its commitments to more fully incorporate equity considerations into its decision-making processes.¹⁶

B. Commonwealth Edison Company Performance Metrics Dockets

The Illinois Commerce Commission recently approved Performance Metrics plans for the state's two largest utilities (Commonwealth Edison Company and Ameren). However, the context is somewhat different than other states because there is a statutory requirement for the establishment of the plans that includes explicit call out to improve equity in improving reliability. Specifically, 16-108(e)(2)(A)(i) the Climate & Equitable Jobs Act (CEJA) requires a locational reliability and resiliency metric:

(i) Metrics designed to ensure the utility maintains and improves the high standards of both overall and locational reliability and resiliency, and makes improvements in power quality, including and particularly in environmental justice and equity investment eligible communities.¹⁷

On September 27, 2022, the Illinois Commerce Commission (ICC) approved the Performance Metrics plans for both Ameren¹⁸ and Commonwealth Edison Company (ComEd).¹⁹ While the

¹⁶ Michigan Public Service Commission, November 18, 2022 Order, In the matter of the application of DTE ELECTRIC COMPANY for authority to increase its rates, amend its rate schedules and rules governing the distribution and supply of electric energy, and for miscellaneous accounting authority, MPSC Docket No. U-20836, at pp. 458-459

¹⁷ 220 ILCS 5/16-108.18(e)(2)(A)(i)

¹⁸ Illinois Commerce Commission, *Order, Petition for Approval of Performance and Tracking Metrics pursuant to 220 ILCS 5/16-108.18(e)*, ICC Docket No. 22-0063, September 27, 2022.

¹⁹ Illinois Commerce Commission, *Order, Petition for the Establishment of Performance Metrics Under Section 16-108.18(e) of the Public Utilities Act*, ICC Docket No. 22-0067, September 27, 2022.

Plans for Ameren and ComEd are similar, they differ in important respects. For efficiency sake, we only discuss the approved plan for ComEd plan in this section. Importantly, in our recommendation in response to Question 2 below, we also recommend an alternative proposal by the Environmental Defense Fund / Citizens Utility Board of Illinois and supported by ELPC and Vote Solar that relies upon a comparative analysis of reliability in disadvantaged communities compared to the rest of the population.

The Performance Metrics Plan for ComEd establishes performance metric in six categories: reliability, peak load reduction, supplier diversity, affordability, interconnection application processing timeliness, and customer service. The Plan also allocates 32 basis points of potential incentives for achieving the desired metrics or 32 basis points of potential penalties for underperformance. ComEd's approved Plan includes two performance metrics related to reliability:

- Metric I.1: Overall Reliability and Resiliency Based on SAIDI, and
- Metric I.2: EJ and R3 Communities Reliability and Resiliency

Metric I.2: EJ and R3 Communities Reliability and Resiliency ("EJ/R3 Reliability Metric") was designed to meet the statutory requirement to maintain and improve reliability in "environmental justice and equity investment eligible communities." The term Equity Investment Eligible Communities ("EEIC") as defined in CEJA includes environmental justice and R3 communities (which are also terms defined in other sections of statute).²⁰ The important point for purposes of the MPUC's consideration is just that there is a methodology for identifying disadvantaged communities for doing a comparative analysis. Potential tools for doing this in Minnesota are discussed below.

The EJ/R3 Reliability metric establishes baseline performance indexes for four dimensions of reliability in EEICs

- SAIDI (System Average Interruption Duration Index): the average outage duration for each customer served during a calendar year.
- SAIFI (System Average Interruption Frequency Index) ,
- CEMI4 (Customers Experiencing Multiple Interruptions – 4): customers experiencing more than four interruptions per year for three consecutive years.
- CELID (Customers Experience Long Duration Outages -12) customers experiencing at least one 12-hour interruption per year for three consecutive years

The baseline for each of these dimensions of reliability will be calculated by determining the average performance during the two years from 2021 through 2023 in which performance is best (i.e., the lowest number of minutes, interruptions, or customers respective of the index unit of measure). The incremental annual targets will be established such that, to earn an incentive for

²⁰ For purposes of identifying Equity Investment Eligible Communities, environmental justice communities are defined by the Illinois Solar for All program pursuant to Illinois Public Utilities Act Section 16-108.18(b). (<https://www.illinoisfa.com/environmental-justice-communities/>) R3 communities were defined pursuant to Section 10-40 of the Cannabis Regulation and Tax Act. 220 ILCS 5/16- 108.18(b); 410 ILCS 705/10-40. (<https://r3.illinois.gov/eligibility>)

the SAIDI, ComEd must achieve an improvement of 1.5% per year on average to achieve a total reduction target of 15% from the baseline over a 10-year period. The incremental annual targets will be established such that, to earn an incentive for each of the SAIFI, CEMI4R3 and CELID12R3 indices, ComEd must achieve an improvement of 1.0% per year on average for each index to achieve a total reduction target of 10% from the baseline over a 10-year period. To earn an incentive in 2033 for EJ/R3 SAIDI, ComEd must achieve cumulative improvement of 15% from the baseline. For EJ/R3 SAIFI, CEMI4R3 and CELID12R3 to each earn an incentive in 2033, ComEd must achieve cumulative improvement of 10% each from the baseline.

IV. Topics Open for Comment

The Commission has requested feedback on three specific questions.

A. Question 1: Do the existing metrics (CELI 12, CEMI 6,1 percent of customers experiencing one or more involuntary disconnection in a year, and low-income energy efficiency and energy bill assistance program participation) and demographic data used adequately address the Commission's Order for the development of future metrics? Are any modifications needed?

As ELPC/VS argued in the lead up to the Commission's consideration of Xcel's 2020 Safety, Reliability, and Service Quality report (Docket No. 21-237), in order to decide whether targets and performance metrics are appropriate once three years of data is available, we need to define a metric that quantifies the relationship that we are seeking to understand.²¹

In order to do a robust, granular analysis comparing reliability in equity communities several steps are needed:

- Expand data collection and reporting to include additional pertinent information
- Define a metric calculation methodology
- Establish baseline performance and reliability

The existing map is useful for customers and stakeholders to understand the reliability metrics of their communities on an absolute basis as well as relative to other communities. However, additional/different data is needed to conduct a more thorough analysis to conduct an equity metric. Fundamentally, the map is useful for visualizing information for customers to use for the analysis, but a different set of data is needed for developing a metric calculation methodology and a robust locational reliability/equity quantitative analysis.

First, while the CELI-12 and CEMI-6 metrics provide data that is relatable for individual customers, it is not necessarily the optimal for quantitative analysis. For the purposes of establishing reliability/equity performance metrics, SAIDI and SAIFI remain useful because they normalize data in indices that make comparison more meaningful.

²¹ Environmental Law & Policy Center and Vote Solar, *Letter to the Commission*, Minnesota Public Utilities Commission Docket No. E002/M-21-237 *In the Matter of Xcel Energy's annual report on safety, reliability, and service quality for 2020; and petition for approval of electric reliability standards for 2021*, January 21, 2022.

In addition, we suggest that supplemental data not needed for the metrics calculation would provide additional transparency and visibility into the effectiveness of measures to fully incorporate equity into its distribution system planning processes. We suggest a reporting template that would include the following fields

- Census Block Group GEOID (12-digit GEOD provided by the US Census)
- Disadvantaged Community (as defined by the Climate and Economic Justice Screening Tool (see below))
- Meter Reading Factor (% AMI)
- # of Customer meters in the census block group
 - Residential
 - Commercial
 - Industrial
 - Other
 - Total
- # of unique feeders that service customers in the census block group
- Primary region or work center
- Miles of Lines (approximate)
 - Overhead
 - Underground
- Blue Sky Reliability (including MEDs)
 - SAIDI
 - SAIFI
 - CELI-12
 - CEMI-6
- Adjusted Reliability (MEDs per SRSQ)
 - SAIDI
 - SAIFI
 - CELI-12
 - CEMI-6
- Percent of customers experiencing one or more involuntary disconnection in a year
- Low-income energy efficiency participation
- Energy bill assistance program participation

We suggest that the next steps are to define a methodology to conduct a quantitative analysis of the data the Company has collected to understand the relationship between reliability and equity at the appropriate levels of geographic granularity (probably paralleling the reliability reporting at the work center and system levels).

The underlying premise of this entire conversation is to ensure that considerations of equity are fully incorporated into all the Company's planning and investment decisions, including about the distribution system. The locational reliability/equity effort that the Commission is pursuing in this docket is an important part of that overall effort to develop a systematic approach to

understanding to what extent or whether disadvantaged communities have been disproportionately impacted by poor reliability, underinvestment in distribution systems, and/or other dimensions of distribution system performance such as hosting capacity or power quality.

Finally, there are multiple dimensions of service quality when it comes to distribution grid services, including reliability, power quality, customer service, and the ability of the grid to accommodate distributed energy resources that customers wish to deploy to manage their own energy use or electrify their loads.

B. Question 2: What methodology, if any, should be used to analyze metrics displayed on Xcel's map to allow for measurement of equity focused metrics? Alternatively, is it more appropriate for individuals to apply their own analysis of the map data to complement their recommendations in PBR and other dockets?

ELPC/VS recommend that the Commission consider the Reliability and Resilience in Environmental Justice Communities proposal proposed by the Environmental Defense Fund and the Illinois Citizens Utility Board in Rebuttal Testimony during the ComEd Performance Metrics proceeding.²²

As described by the Performance Metrics plan proposed by EDF/CUB:

The Reliability and Resiliency in Vulnerable Communities metric first evaluates utility performance using four indices that compare reliability and resiliency performance in Equity Investment Eligible Communities to other customers not located in Equity Investment Eligible Communities in the same county. The use of indices allows for a comprehensive comparison of the differences in reliability and resiliency performance for equity customers.²³

Essentially, the methodology can be summarized as follows:

- Calculate the system-wide indexes for each of the selected reliability measures (the proposal uses SAIDI, SAIFI, CEMI-4, and CELID-12 with Major Event Days)
- Calculate each index for each census block group in the service territory
- Compare the reliability indexes in non-EEIC census block groups by county with EEIC census block groups within the same county.²⁴

²² Rebuttal Testimony and Exhibits of Andrew Barbeau, the Accelerate Group, on behalf of the Environmental Defense Fund and the Citizens Utility Board, ICC Docket No. 22-0067, June 3, 2022. ([Link](#))

²³ Ibid. EDF-CUB Exhibit 4.1, pg. 7.

²⁴ Conducting the analysis at a more granular level than the utility service territory – such as the county level -- allows for an apples-to-apples comparison of EEIC to non-EEICs that recognizing the different underlying reliability characteristics of the more densely populated parts of the utility service territory. This analysis could also be conducted for Xcel at the work center region or other geographic designation.

Alternatively, the EJ/R3 Reliability Metric finally approved by the ICC provides a simpler, but less granular and ultimately less robust approach.²⁵

When conducting a comparative analysis of equity communities to the rest of the population, as proposed in the EDF-CUB RRVC metric described above, one of the challenges is determining which communities to identify as being equity communities. That challenge was obviated in the case of the Illinois case described above because CEJA defined Equity Eligible Investment Communities. For purposes of conducting this analysis in Minnesota, it will be necessary to address this question using available tools.

ELPC/VS propose the Commission consider two options for identifying equity communities for purpose of the locational reliability/equity metric:

- The Climate and Economic Justice Screening Tool (CEJST) was recently released by the White House as Version 1 in December 2022. CEJST provides a standardized and accessible tool that defines Disadvantaged communities using a variety of criteria.²⁶
- The Minnesota Pollution Control Agency has published a map entitled *Understanding Environmental Justice in Minnesota*.²⁷ The MPCA map identifies “areas of increased concern for environmental justice.”

Both the MPCA EJ map and the CEJST map report data at the census tract level, which is less granular than the census block group level data that Xcel is currently collecting and reporting. However, because the structure of census data is hierarchical (i.e. block groups are statistical divisions of census tracts, generally defined to contain between 600 and 3,000 people, consisting of clusters of blocks within the same census tract), it would still be possible to use the data collected by Xcel at the block group level to do the quantitative analysis.

C. Question 3: Are there other issues or concerns related to this matter?

ELPC/VS have no other issues or concerns to raise in this matter.

V. Conclusion

In conclusion, ELPC/VS appreciate the Commission’s ongoing efforts to incorporate considerations of equity into all aspects of its regulatory work and to drive the Company to incorporate equity into all aspects of its planning, investment, and operations business practices. As we have argued in other contexts and will continue to do so, energy justice is an important part of the Commission’s mandate to ensure **just** and reasonable rates.

²⁵ Commonwealth Edison Company, *Multi-Year Performance and Tracking Metrics Plan*, November 22, 2022. Illinois Commerce Commission Docket No. 22-0067, *Petition for the Establishment of Performance Metrics Under Section 16-108.18(e) of the Public Utilities Act*. <https://www.icc.illinois.gov/docket/P2022-0067/documents/330683>

²⁶ Climate and Economic Justice Screening Tool is accessible at:
<https://screeningtool.geoplatform.gov/en/#3/33.47/-97.5>

²⁷ Link: <https://mpca.maps.arcgis.com/apps/MapSeries/index.html?appid=f5bf57c8dac24404b7f8ef1717f57d00>

The specific questions addressed in this Notice of Comment relate to one important aspect of the broader energy justice efforts – developing a metric to ensure that reliability in disadvantaged communities is equitable relative to the rest of the population. This simple principle, while almost universally accepted as a goal, has not heretofore been measured, much less acted upon in a deliberate fashion in the utilities’ planning, investment and operations. The Minnesota PUC lead the way nationally in directing Xcel to develop a mapping tool to help customers visualize reliability in their communities. In this Notice of Comment, it appears that the Commission is now prepared to consider developing a specific locational reliability/equity metric in the context of the broader performance metrics framework.

ELPC/VS greatly appreciate the Commissions efforts in this endeavor and have provide responses and context for this effort that we hope will be helpful to the Commission. We propose a model for a metric calculation that was first proposed in Illinois performance metrics dockets that could be easily adapted for Xcel.

We look forward to working with the Commission, the Company and other stakeholders going forward in this important effort.

Respectfully Submitted,

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Residential Utilities Division	Generic Notice	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	Electronic Service	Yes
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Scott	Doug	dscott@gpsd.net	Great Plains Institute	Electronic Service	No
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Villarreal	Christopher	cvillarreal@rstreet.org	R Street Institute	Electronic Service	No
Windler	Joseph	jwindler@winthrop.com	Winthrop & Weinstine	Electronic Service	No
Zethmayr	Jeff	jzethmayr@citizensutilityboard.org	Citizens Utility Board	Electronic Service	No
Zimmerman	Kurt	kwz@ibew160.org	Local Union #160, IBEW	Electronic Service	No
Zomer	Patrick	Pat.Zomer@lawmoss.com	Moss & Barnett PA	Electronic Service	No

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