STATE OF MINNESOTA
PUBLIC UTILITIES COMMISSION

Katie Sieben, Chair
Joseph K. Sullivan, Vice Chair
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May 8, 2025

RE: In the Matter of a Commission Inquiry into a Framework for Proactive Distribution Grid Upgrades and Cost Allocation for Xcel Energy (Docket No: E002/CI-24-318)

Initial Comments of the Union of Concerned Scientists

On behalf of our 12,042 members and supporters in Minnesota, the Union of Concerned Scientists ("UCS") submits these comments in response to the Notice of Comment Period issued April 7, 2025 In the Matter of a Commission Inquiry into a Framework for Proactive Distribution Grid Upgrades and Cost Allocation for Xcel Energy.[1] UCS is a non-profit organization that uses rigorous science to advocate for a healthier planet and safer world.

UCS commends the Commission for undertaking a deliberate and expedited stakeholder working group process to draft a framework for proactive upgrades to the distribution system. UCS participated in the working group and led a subgroup for the latter half of the process.

UCS Recommendations

UCS strongly recommends the Commission establish a Framework for Proactive Distribution Grid Upgrades ("Framework") for Xcel Energy. The urgency of meeting state energy goals as well as the increasing deployment of electrification and distributed energy resources necessitates the evolution of grid planning processes. Proactive distribution grid upgrades can help facilitate a more timely connection of both electrification loads and distributed generation resources, the latter of which has suffered long queues to connect to the grid for some time.[2] Historical grid planning practices will become increasingly ill-suited to meet the monopoly utility's obligation to serve the needs of all customers, both load and generation, as electrification and distributed generation

[1] Notice of Comment Period (April 7, 2025). *In the Matter of a Commission Inquiry into a Framework for Proactive Distribution Grid Upgrades and Cost Allocation for Xcel Energy* (Docket No: E002/CI-24-318). https://www.edockets.state.mn.us/documents/%7BE0831096-0000-CD13-930C-1797E172AFFA%7D/download?contentSequence=0&rowIndex=1

[2] Jossi, Frank (2022). "Minnesota regulators want Xcel to cut wait time for connecting solar to its grid." Canary Media. https://www.canarymedia.com/articles/enn/minnesota-regulators-want-xcel-to-cut-wait-time-for-connecting-solar-to-its-grid

increases in the future. Adopting a Proactive Distribution Grid Upgrade Framework is a key step to evolving utility planning to better serve the grid now and into the future.

Specifically, adopting critical elements of the draft framework, as identified below, will result in meaningful proactive upgrades to advance progress toward meeting state energy goals and enable customers who wish to adopt clean energy technologies to do so without undue delays.

UCS recommends the Commission adopt elements of the Draft Framework as follows in Table 1, and we provide recommendations for pursuing Phase 2 of the Working group in Table 2. We further recommend the Commission consider adopting a version of the Framework for the other investor owned utilities in the state.

Table 1. Recommendations on establishing a Proactive Distribution Grid Upgrade Framework

Section of Framework	Recommended Items	Notes
A. Introduction	A.1, A.3, A.5, A.7, A.8, A.11, A.14. A.15	Do not oppose A.6 (alt to A.7), Do not oppose A.9 (alt to A.8)
B. Definitions	B.2, B.3, B.4, B.5, B.6, B.9, B.10, B.11, B.12., B.14, B.16	No position at this time on B.7 or B.8, B.13, B.17
C. Process	C.1, C.2, C.3, C.4, C.6, C.8, C.9, C.1(a-e)	No position at this time on C. 11
D. Baseline Information	D.1, D.2, D.3, D.4, D.5	Support all items in Sec. D
E. Forecast	E.1, E.2, E.3, E.4, E.5, E.6	Support all items in Sec. E
F. Potential Sites for Proactive Upgrades	F.1, F.2, F.3, F.4, F.5, F6 (a-j), F.7, F.8	Support all items in Sec. F
G. Proactive Upgrade Proposal Evaluation Criteria	G.1, G.2, G.3, G.4, G.5, G.6, G.7, G.8, G.9, G.10, G.11, G.12, G.13, G.15, G.16	
H. Proposal for non-locations specific proactive measures	H.1, H.2	Support both items in Sec H.
J. Cost Recovery	J.4, J.7, J.8., J.9, J.13, J.18	No position at this time on J.1, J.2, J.3
K. Cost Allocation	Reserve comment	Agree with principle that cost share or CIAC fees should offset the cost to ratepayers
L. Capacity Reservation	Reserve comment	
M. Reporting	M.1, M.3, M.4, M.5, M.6, M.7, M.8, M.9, M.10, M.11, M.12	See additional comment below on M.6

Table 2. Recommendations for pursuing Phase 2 of the Proactive Grid Upgrade Framework.

Phase 2 Proposal Section	Recommended Items	Notes
Timing	1	Do not oppose 2
Topics	3(a-c), 4, 5, 6, 7, 8	All items

Discussion of Select Framework Provisions and Phase 2 Topics

For the purposes of these initial comments, UCS focuses on briefly describing a few key issues within the draft framework, including Section A – Introduction, Section C – Process, and Section M – Reporting. We also elaborate on select topics in the Phase 2 Proposal. We reserve the right to elaborate on other recommendations, as enumerated above, in reply comments.

- Section A – Introduction

As the grid evolves with electrification and distributed energy resources, the traditional relationship between supply and demand is changing. While those clean energy technologies may impose costs on the grid to interconnect, they can also provide benefits to the grid when they are leveraged through grid supporting programs. Those grid benefits, in turn, benefit all ratepayers. Thus, it is appropriate to consider the benefits in cost allocation, as proposed in provisions A.14 and A.15.

- Section C – Process

The stakeholder process outlined in section C.10 (a-e) is important for transparency, which has three key benefits. First, transparency in forecasting and creating proactive investment proposals builds trust among stakeholders in the process and the outcomes of the forecasting exercise. Second, transparently sharing the forecasting analysis and giving opportunities for feedback creates space for stakeholders to share information that may enhance the certainty of the forecast. Third, the requirement that the utility report back on the feedback received, whether it was incorporated into the forecast, and why creates accountability. Such accountability further creates trust and confidence in the process and outcomes. The result will be better proactive plan proposals to meet future needs.

- Section M – Reporting

Importantly, the definition of DERs in Section B.6 includes “electrified end uses that can be used as a resource”. Electrified end uses are not listed in the reporting table M.6. However, electrified end uses should be captured in the reporting on DERs. UCS does not oppose using the “other category” of the M.6 table for reporting on those DERs in the inaugural iteration of the Framework, and we encourage the commission to consider whether electrified load resources should be explicitly included in the table when the Framework is updated in the future. Notably, at least one such electrified end use, namely electric vehicles, also has the potential to conduct grid-parallel discharging from its battery (a form of “V2G”). As programs for grid-parallel battery discharging become more widely available in the service territory, V2G may merit its own line in the DER reporting table.

- Topic 5 – Flexible Interconnection

Flexible interconnection agreements are an important way to enable timely interconnection of distributed generation resources. They are also a key opportunity for incorporating new load, such

as a fleet of electric vehicles onto the grid.[3] Flexible interconnection for load, in addition to generation, should be explicitly included in the Phase 2 scope of topics.

Conclusion

UCS appreciates the opportunity to comment on the Framework for Proactive Distribution Grid Upgrades. We recommend the Commission establish the Framework, with the provisions recommended herein, to apply to Xcel Energy and consider establishing a substantially similar framework for the other investor owned utilities in the state.

Sincerely,

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[3] Horan, Casey et al. (2025). "Let's Get Flexible: Considerations for Unlocking Grid Capacity Using Flexible Interconnection." Environmental Defense Fund.
https://library.edf.org/AssetLink/q812pd5afr3hboi61cm503fprla5ge0p.pdf

CERTIFICATE OF SERVICE

I, Sam Houston, hereby certify that I have this day, served a copy of the following document to the attached list of persons by electronic filing and electronic mail.

Initial Comments of Union of Concerned Scientists

Docket No. E002/CI-24-318

Dated this 8th day of May 2025

/s/Sam Houston

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