



ENVIRONMENTAL LAW & POLICY CENTER

Protecting the Midwest's Environment and Natural Heritage

April 22, 2020

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

RE: Supplemental Reply Comments of the Environmental Law & Policy Center and Vote Solar

Docket No. E002/M-19-666

Dear Mr. Seuffert,

Please find enclosed the *Supplemental Reply Comments of the Environmental Law & Policy Center and Vote Solar*. These documents have been electronically filed and served through the eFiling system and by First Class USPS Mail to those who have requested paper service.

Please feel free to contact me with any questions you may have regarding this filing.

Respectfully submitted,

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

Katie Sieben	)	Chair
Valerie Means	)	Commissioner
Matthew Schuerger	)	Commissioner
Joseph T. Sullivan	)	Commissioner
John Tuma	)	Commissioner
	)	
In the Matter of Xcel Energy’s 2019	)	PUC Docket No. E002/M-19-666
Integrated Distribution Plan (IDP) and	)	
Advanced Grid Intelligence and Security	)	
Certification Request	)	

**SUPPLEMENTAL REPLY COMMENTS OF
THE ENVIRONMENTAL LAW & POLICY CENTER AND VOTE SOLAR**

ON

**XCEL ENERGY’S INTEGRATED DISTRIBUTION PLAN AND
ADVANCED GRID INTELLIGENCE AND SECURITY CERTIFICATION REQUEST**

April 22, 2020

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I. GENERAL OVERVIEW

The Environmental Law & Policy Center (ELPC) and Vote Solar (collectively ELPC/VS) respectfully submit these supplemental reply comments to comments filed by other parties regarding Xcel Energy's 2019 Integrated Distribution Plan (IDP) and Advanced Grid Intelligence and Security (AGIS) Certification Request, pursuant to the Minnesota Public Utilities Commission's April 1, 2020 Notice of Extended Reply and Supplemental Comment Period in Docket No. E-002/M-19-666.

ELPC/VS have provided extensive initial and reply comments explaining its recommendations to the Commission in this proceeding. ELPC/VS will not rehash those comments and recommendations here, but note that nothing in the reply comments filed in this proceeding cause ELPC/VS to modify its positions or recommendations as laid out in our reply comments. ELPC/VS address only two issues in their supplemental reply comments. The first concerns Xcel's discussion of its reliability investments. The second concerns Xcel's non-wires alternatives analysis.

II. RESPONSE TO XCEL AND DOC REGARDING ELPC/VS PROPOSED FILING REQUIREMENT 3F (LOCATIONAL RELIABILITY AND EQUITY).

In initial comments, ELPC/VS recommended that the Commission add a new filing requirement 3F, requiring Xcel (the "Company") to provide maps illustrating the reliability of the Company's distribution system at a feeder-level, and explain how its distribution system reliability spending will improve equity and prioritize those portions of its system with poor reliability performance. ELPC/VS's recommendation was aimed at strengthening the linkage between the Company's service quality report dockets (in which it *reports* on reliability performance) and the Company's IDP (in which it explains its plans to *improve* reliability performance).

In reply comments, Xcel stated that locational reliability and equity reporting are being addressed in the Company's annual electric service quality report docket, which Xcel believes "is a more appropriate forum than the IDP to examine those issues." Xcel Reply Comments Attachment A at 3. The Company further states that given its existing service quality reporting framework, and the "nascent nature of developing additional locational and equity reliability metrics and reporting, we believe it is appropriate at this time for the annual service quality filings to be the primary source for distribution system performance information." *Id.* at 4.

In proposing to limit any discussion of locational reliability and equity in its IDP, Xcel ignores that the IDP—not its service quality report docket—is where it presents its plans for addressing reliability concerns. The information that the Commission receives from the Company, and the input that it requests from interested parties, focuses on metric development, not investment planning. *See* Docket Nos. E002/M-20-406 *et al.*, Notice of Comment Period (Apr. 20, 2020). As such, while the electric service quality report docket may continue to be the appropriate forum for the Company to *report* distribution system performance, the IDP is the appropriate forum for the Company to *explain* how its planned investments will not only

improve system-wide reliability but will also address specific poor-performing areas of Xcel's distribution system.

DOC notes that reliability investments such as the Company's ISI Initiative will be subject to rate case prudence review, which will provide a forum for stakeholders "to obtain more specific information and better evaluate Xcel's planned investments." DOC Reply Comments at 8. ELPC/VS does not suggest that any information Xcel provides in its IDP should substitute for rate case prudence review (which remains critical). However, the IDP provides a valuable opportunity for stakeholders with an interest and expertise in distribution planning to provide their input on the Company's strategy for addressing the reliability of its distribution system. This scrutiny is different from the traditional prudence review, which focuses on costs. ELPC/VS further note that equity considerations are important at every stage of the investment planning process and as such should be integrated into the IDP, even if equity impacts are measured and evaluated in the context of the service quality proceeding as well.

ELPC/VS therefore reiterate their recommendation that the Commission adopt the following filing requirement:

3F (new): Locational Reliability and Equity.

1. Xcel shall provide a map that illustrates the reliability of the Company's distribution system at a feeder-level.

2. Xcel shall describe how its proposed reliability investments will prioritize those portions of its system with poor reliability performance.

3. Xcel shall explain how its proposed reliability investments will advance equity across its service territory.

III. RESPONSE TO DOC REGARDING ELPC/VS PROPOSED MODIFICATION TO FILING REQUIREMENT 3.E.1

In initial comments, ELPC/VS recommended certain additions to filing requirement 3.E.1, relating to Xcel's non-wires alternatives analysis. Those additions would, at a high level, require Xcel to provide additional information regarding its planned distribution system projects and carry out an RFP as a part of its non-wires alternatives analysis.

DOC stated that it "agrees that this additional information would be helpful in evaluating Xcel's NWA proposals, and that an RFP process would increase transparency of costs and benefits, and generally result in an opportunity for third-party developers to propose NWA solutions that are cost-competitive with traditional utility investments in physical infrastructure." DOC Reply Comments at 5. However, DOC declined to adopt ELPC/VS's recommended modification to IDP requirement 3.E.1 on the basis that requirement 3.E.1 "currently contains language that could be interpreted to require Xcel to provide the information that ELPC and Vote Solar recommend be provided." *Id.*

ELPC/VS do not disagree that requirement 3.E.1 could be reasonably interpreted in this manner. This interpretation would lead to the conclusion that Xcel's IDP is incomplete as filed, given that Xcel has not provided the information that ELPC/VS recommend be provided.

ELPC/VS believe, however, that it is more productive to clarify the filing requirements, rather than reading the current filing requirement narrowly, such that the Company continues to improve its NWA analysis in the future.

IV. CONCLUSION

ELPC/VS appreciate Xcel's willingness to work with stakeholders to improve its distribution planning process. Particularly, ELPC/VS appreciate Xcel's expanded discussion on smart inverters in its reply comment, which it provided in response to ELPC/VS's initial comments. ELPC/VS continue to believe that our recommendations in this proceeding are reasonable and will improve the Company's IDP going forward. We request that the Commission adopt our recommendations for the reasons in these, our reply, and our initial comments.

Respectfully submitted,

April 22, 2020

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CERTIFICATE OF SERVICE

Docket No. E002/M-19-666

I, Rebecca Lazer, hereby certify that I have served a true and correct copy of the *Supplemental Reply Comments of the Environmental Law & Policy Center* to all persons at the addresses indicated on the attached service list by electronic filing, electronic mail, or by depositing the same envelope with postage paid in the United States Mail at Chicago, Illinois for those who have requested paper service.

April 22, 2020

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