

April 22, 2020

William Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, MN 55101

RE: Supplemental Comments of the City of Minneapolis

Docket No. E002/M-19-666 Xcel Energy 2020-2029 Integrated Distribution Plan

Dear Mr. Seuffert:

The City of Minneapolis (“Minneapolis”) has reviewed the Comments and Reply Comments regarding the 2020-2029 Xcel Energy (“Xcel” or “the Company”) Integrated Distribution Plan (“IDP”). We offer these Supplemental Comments with updated recommendations for consideration by the Commission, Xcel and others. We value the effort and insights associated with the work completed to date. Minneapolis views the IDP process through the lens of prioritizing public health, equity, climate responsiveness, and affordability in pursuit of environmental, economic, and social sustainability¹.

Minneapolis appreciates the comments and recommendations of others and the feedback on our recommendations from several parties. We wish to clarify two topics to promote understanding of our positions.

- 1) Regarding City of Minneapolis Recommendation 1.c. *“Modify the criteria used to screen for NWA projects by reducing the project cost threshold to \$1 million to address the issues that Xcel raised with the current threshold”*²

In Initial Comments, City of Minneapolis made this recommendation based on Xcel’s observation within the IDP report that the current \$2 million minimum threshold may screen out less expensive, lower risk projects that may be more suitable for NWA (pages 97-98). The Department of Commerce expressed concern about this recommendation in their *Reply Comments* and cautioned against requiring additional analysis that may prove redundant.³

For context, we wish to include two citations that we inadvertently omitted that prompted the recommendation:

Costs – Per the Commission’s Order, we evaluated projects with costs greater than \$2 million.

¹ City of Minneapolis [Sustainability Homepage](#).

² Docket 19-666. [City of Minneapolis Comments](#). March 17, 2020.

³ Docket 19-666 [MN Department of Commerce Reply Comments](#). p.9. Apr. 10, 2020.

However, we believe there is additional work to be done to best identify the range of project costs for this filter.⁴

And:

Most capacity projects budgeted at greater than \$2 million are intended to solve a larger numbers of risks – this vastly increases the complexity of the problems to solve with a NWA, and in turn increases the amount of resources required to conduct the analysis. Projects with fewer capacity risks to solve are more localized and therefore more straightforward.⁵

Minneapolis understands the Department’s concern given the labor-intensive nature of the analysis. Minneapolis modifies the recommendation as follows:

Based on experience gained with the IDP process to date, the Commission directs Xcel to work with stakeholders to identify improved screening criteria for potential NWA projects.

- 2) Regarding City of Minneapolis Recommendation 4: *[Minneapolis recommends] Xcel be required to consider the energy and climate goals of the Minnesota communities it serves along with customer preference trends when responding to the Commission’s Aug 2018 IDP order point 3.A.32 and July 2019 IDP order point 7 in future IDPs.⁶*

In Reply Comments, Xcel indicated:

We have a long history of constructive relationships with the communities we serve, which includes helping them achieve climate and other energy goals. No change to the IDP requirements is necessary, as we are already factoring public policies and goals into our planning.⁷

Minneapolis appreciates Xcel’s recognition of public policy as a valid driver of climate-responsive technology adoption.⁸ We look forward to continued collaboration with Xcel on our respective climate goals.

The Department of Commerce expressed concern with our Recommendation 4:

First, the City of Minneapolis appears to be supporting the concept of burdening all of Xcel’s ratepayers with incremental costs incurred in support of the goals of a single ratepayer, or subset of ratepayers, without a showing of benefits to all of Xcel’s ratepayers. This concept does not conform to Minnesota’s regulatory construct, including cost causation principles.⁹

Minneapolis clarifies that we do not wish to increase cost burdens on non-Minneapolis customers, but rather, we advocate for infrastructure investments to be deployed in an efficient manner, consistent with public policy goals. Studies show doing so can save all customers money.¹⁰

⁴ Docket 19-666 [Xcel 2019 Integrated Distribution Plan](#). p. 97 Nov 2019.

⁵ *Id.* p.98.

⁶ *Id.* p. 8

⁷ [Xcel Reply Comments](#) Attachment A. p.11

⁸ [Citizens Utility Board/Strategen Comments](#). Mar 17, 2020.

⁹ [MN Department of Commerce Reply Comments](#). Apr 10, 2020.

¹⁰ [Vibrant Clean Energy Presentation to the MPUC](#). Minnesota’s Smarter Grid: Pathways Toward a Clean, Reliable and Affordable Transportation and Energy System. Summary slides 20 and 38. Special Planning Meeting. Oct. 30, 2018. Accessed Apr. 17, 2020.

The concept of Complete Streets is viewed as a useful analogy by some. Complete Streets frames planning, design, construction, operation, and maintenance of transportation networks with all users in mind. The idea is that streets are a vital part of public infrastructure, and that everyone, regardless of age, ability, income, race, or ethnicity, ought to have equitable, convenient access to community destinations whether walking, driving, bicycling, or taking transit.¹¹ The result is a more efficient and socially just system with positive public health, environmental, and economic outcomes.

Similarly, investing in a flexible, resilient grid that provides necessary grid services, including two-way power flows and communication, is a people-centered, no-regrets strategy that promotes equity. The vision for a modern grid that supports the decarbonized electricity system we aspire to is captured in initiatives like e21: *An Electric System for the 21st Century*¹² and within the Commission's five principles:

- Maintain and enhance the **safety, security, reliability, and resilience** of the electricity grid at fair and **reasonable costs**, consistent with the **state's energy policies**;
- Enable greater **customer engagement, empowerment, and options** for energy services;
- Move toward the creation of efficient, cost-effective, **accessible grid platforms** for new products and services, with opportunities for **adoption of new distributed technologies**;
- Ensure **optimized** use of electricity grid assets and resources to **minimize total system costs**; and
- Provide the Commission with the information necessary to understand Xcel's short-term and long-term distribution system plans, the **costs and benefits** of specific investments, and a comprehensive analysis of ratepayer cost and value.¹³

Using the Complete Streets analogy, Xcel is responsible for managing many billions of dollars of critical public infrastructure, much of it with an expected life measured in decades and well into the timeframe of the state's and cities' climate goals. Proactive planning is a way to deliver high quality services cost-effectively and equitably for the benefit of both individual customers and the grid community. This is why we believe that incorporating energy policy goals adopted by cities that Xcel serves is appropriate to include in grid planning.

Interoperability

Finally, several parties emphasized the importance of demonstrating full functionality that enables customer empowerment and operational excellence¹⁴ as being critical to capture the public benefit associated with AGIS beyond utility operational efficiencies¹⁵. We agree.

Minneapolis understands that as advanced metering infrastructure is deployed, the actual performance does not always match the desired grid flexibility and customer benefits promoted by vendors. A utility can protect itself and its customers by carefully negotiating the terms of contracts with vendors such that full payment is withheld until the advertised performance milestones are reached. This requires extensive coordination and negotiation upfront with the numerous vendors and takes time. But if done well, it means that the various equipment manufacturers and software developers are committed not just to working with the utility, but also to working with each other. The burden is on the vendors as well as the utility to demonstrate the functionality promised, which leads to lower risk and better outcomes. The interoperability

¹¹ <https://smartgrowthamerica.org/program/national-complete-streets-coalition/>

¹² <https://e21initiative.org/>

¹³ [Order: Minnesota Integrated Distribution Planning Requirements for Xcel Energy](#). August 30, 2018.

¹⁴ Clean Energy Economy Minnesota Initial Comments. Mar 17., 2020. p.7.

¹⁵ Remote meter reading, remote disconnects/and connects, identifying power outage locations are a few examples of operation efficiencies that save labor but don't lead to customer empowerment.

is what makes an advanced meter more than just an expensive meter.

City of Minneapolis Summary of Updated Recommendations

City of Minneapolis continues to recommend the Commission accept the Company's 2020-2029 plan with reporting requirements¹⁶ and enhancements as described below. (Changes to our original comments in **bold.**)

1.) Based on experience gained with the IDP process to date, the Commission directs Xcel to work with stakeholders to identify improved screening criteria for potential NWA projects.

Modifications may include consideration of:¹⁷

- a. **Project types:** Such as including both capacity and health asset categories
- b. **Project timing:** Following the Commission order more closely by including years 2 – 5 of the plan timeframe so as not to miss opportunities for energy storage and other distributed energy resources, which can be deployed quickly
- c. Technology options and associated cost assumptions
- d. **\$2 million minimum cost threshold**
- e. The NWA methodology and analytical assumptions
- f. Issue an RFP for third-parties to identify NWA solutions and propose market-based project costs.
- g. Evaluation parameters:
 - i. expand the solutions evaluated to include additional NWA technologies using a portfolio approach, including energy efficiency, solar, energy storage, and demand side management deployed in combination with each other
 - ii. In addition to competitive procurements, Xcel should consider opportunities to source NWAs through customer program offerings (for example, overlaying a geo-targeted incentive onto an existing customer demand response program).
 - iii. In future IDPs, Xcel should explore the opportunity to combine NWAs and wires solutions so that the latter can be right-sized and complemented by NWAs in instances where an NWA alone may be unable to meet the full need.

2) Xcel be required to consider the energy and climate goals of the Minnesota communities it serves along with customer preference trends when responding to the Commission's Aug 2018 IDP order point 3.A.32 and July 2019 IDP order point 7 in future IDPs. In particular, distribution planning should include consideration of local community goals, such as local generation¹⁸ and beneficial electrification.

3) We believe that certification should be denied and that cost recovery should be addressed through the multi-year rate plan (MYRP) to allow adequate analysis and fairness for customers, as some of the cost will be part of the variable costs associated with energy and demand.¹⁹

¹⁶ [MN Dept of Commerce Reply Comments](#). Apr 10, 2020. p.23.

¹⁷ Minneapolis agrees with Clean Energy Economy Minnesota that "Identifying specific definitions of NWA runs a risk of changing a broad policy concept (systems view) to a limited sense of responsibility in system planning towards marginal projects (discreet requirement). In an era of increasing options for solving system problems, the definition of NWA (vs. concept) may be lost in the need to identify a "requirement" rather than a "new way of thinking" for system planning." We recommend the stakeholder group keep this in mind to avoid being too prescriptive.

¹⁸ An example of this is the 10% by 2025 local generation goal in the City of Minneapolis Climate Action Plan.

¹⁹ Xcel noted in Reply Comments that Minneapolis' Comments confused certification it seeks with cost recovery

- 4) **We recommend a separate docket to address Xcel's NWA opportunities and that the Commission direct the Company to form an NWA Stakeholder Advisory Group to inform and advance the Company's NWA analysis moving forward,²⁰ including the Company's NWA screening criteria and investment deferral opportunity assessment.²¹ A pilot NWA program should be included under the new NWA docket.**
 - An important element of NWA is allowing the market to propose creative solutions. A pilot can improve the accuracy of cost estimates by incorporating market data points and soliciting feedback from the market and stakeholders. For instance, Xcel could issue a pilot Request for Proposals to solicit responses from the market to determine what solutions are possible. NWA projects can be structured to enable scaling based on lessons learned.
- 5) **The Commission should establish a pathway towards use of the Hosting Capacity Analysis (HCA) in the interconnection process that includes frequent updates, vetting of technical assumptions, and validation of results.²²**
- 6) **Xcel must allow any [interested stakeholder or expert] to participate in stakeholder meetings to ensure that Xcel gets the best possible feedback.²³**
- 7) **The Commission should adopt a specific goal of replacing the MN DIP's fast track screens with the more granular HCA. In order to get the HCA to the point where the Commission, Xcel, and stakeholders trust the results for use in the interconnection process, Xcel should update the HCA more frequently, allow stakeholders to vet assumptions, and develop a plan to verify its results.**
- 8) **Require Xcel to maximize customers' opportunity to save money with the AGIS.²⁴**
- 9) **If Xcel wishes to pursue the Incremental System Investment initiative, the Company shall develop a formal ISI Plan based on specific demonstrated needs and a clear articulation of expected reliability improvements. The ISI Plan should be filed with any future request for cost recovery or certification, or with Xcel's next IDP, whichever comes first.²⁵**
- 10) **We encourage the Commission to consider aligning the IDP process with the performance metrics framework by requiring Xcel to include, in its IDP, a report of its performance on metrics relevant to its distribution system – including at minimum system-wide reliability, locational reliability and equity. Further, Xcel should file, in its performance metrics docket, any cost recovery proposals that it justifies based on improvements in the metrics developed in that docket.**
- 11) **Locational Reliability and Equity.**
 1. **Xcel shall provide a map that illustrates the reliability of the Company's distribution system at a feeder-level.**

²⁰ Docket 19-666. [Initial Comments of the Environmental Law & Policy Center and Vote Solar](#). March 17, 2020.

²¹ [Vote Solar Environmental Law and Policy Center Reply Comments](#). Apr 10, 2020.

²² Docket 19-666. [Initial Comments of Interstate Renewable Energy Council](#). Mar 17, 2020.

²³ *Id.*, OAG Reply Comments.

²⁴ [Institute for Local Self Reliance Reply Comments](#).

²⁵ [Fresh Energy Initial Comments](#)

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.²⁶

- 12) We recommend the Company negotiate favorable terms with AGIS vendors that protects the Company and its customers investments, particularly when equipment functionality depends on interoperability with other vendor systems.

The City of Minneapolis appreciates the resources that Xcel, the Commission, Commission staff, and engaged stakeholders have committed to the IDP process. Thank you for your consideration of our comments.

Sincerely,



Mr. Kim W. Havey, LEED AP, AICP
Division of Sustainability

²⁶ [Vote Solar, Environmental Law and Policy Center](#) Reply Comments. Apr 10, 2020.

CERTIFICATE OF SERVICE

Supplemental Comments of the City of Minneapolis regarding Docket No. 19-666

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