

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

Katie Sieben  
Valerie Means  
Matt Schuerger  
John Tuma

Chair  
Commissioner  
Commissioner  
Commissioner

In the Matter of Xcel Energy’s Integrated  
Distribution Plan and Advanced Grid  
Intelligence and Security Certification Request

DOCKET NO. E002/M-19-666

**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 Public Utilities Commission’s (“Commission”) Notice of Extended Comment Period issued on February 12, 2020. The purpose of these comments is to urge the Commission to take steps to ensure that ratepayers benefit from the technological investments described in Northern States Power Company’s (“Xcel” or “Company”) Integrated Distribution Plan (2020-2029) (“IDP”).

**I. BACKGROUND**

In the 2018 IDP, the OAG argued that the Commission should require Xcel to file additional information about the costs and benefits for grid modernization projects.<sup>1</sup> The Commission agreed, and ordered Xcel to provide a “cost-benefit analysis based on the best information it has at the time and include a discussion of non-quantifiable benefits.”<sup>2</sup> On

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<sup>1</sup> *In the Matter of Xcel Energy’s 2018 Integrated Distribution Plan*, Docket No. E-002/CI-18-251, Comments of the Office of the Attorney General (corrected) at 10-17 (Feb. 25, 2019).

<sup>2</sup> *In the Matter of Xcel Energy’s 2018 Integrated Distribution Plan*, Docket No. E-002/CI-18-251, ORDER ACCEPTING REPORT, AND AMENDING REQUIREMENTS at 11 (July 16, 2019).

November 1, 2019, the Company filed its IDP, which included an Advanced Grid Intelligence and Security Initiative (“AGIS”) that would result in \$582 million in capital costs and \$152 million in O&M costs.

## **II. ANALYSIS**

While the Company does not yet seek recovery for most of the investments in its IDP, it will likely do so in the future. Accordingly, the Commission should continue to require the Company to provide comprehensive information regarding the benefits of these investments, ensure that these benefits actually materialize in a manner that is beneficial to ratepayers, and account for these benefits in any other relevant Commission proceedings.

Xcel’s IDP includes several cost-benefit analyses. Many of these analyses show a benefit/cost ratio of less than one. For example, the AGIS combined costs are \$656 million, but Xcel only projects \$571 million in benefits, resulting in a benefit/cost ratio of .87.<sup>3</sup> Some of the AGIS components have an even lower benefit/cost ratio on an individual basis, including a .83 ratio for Advanced Metering Infrastructure<sup>4</sup> and .57 for Integrated Volt Var Optimization.<sup>5</sup> Xcel argues that there are non-cost benefits to consumers, including “DER [distributed energy resources], distributed intelligence, artificial intelligence, and greater customer engagement with all facets of life.”<sup>6</sup> The Company states that it “would not expect to save money (on a net basis) when investing in these kinds of technologies.”

While Xcel may not expect to save money on these investments, the Commission should make sure that, if ratepayers are ultimately asked to pay for these projects, there is an

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<sup>3</sup> IDP at 157, Table 41.

<sup>4</sup> IDP at 158, Table 42.

<sup>5</sup> IDP at 159, Table 44.

<sup>6</sup> IDP at 161.

understanding of the true nature and scope of the benefits as well as accountability for Xcel to actually deliver those benefits. This is especially true for investments, such as AGIS, that will cost hundreds of millions of dollars and for which Xcel will likely seek cost recovery from ratepayers. In a step towards achieving accountability, Xcel did propose a limited suite of metrics, including customer awareness, customer engagement, customer satisfaction, and system benefits.<sup>7</sup> The Company did not, however, include “specific metrics related to future operational capabilities or products and services that will be enabled by AGIS at this time.”<sup>8</sup>

While this docket will not determine recoverability for these costs, the Commission should think now about how it will ensure that ratepayers receive the currently amorphous benefits that Xcel is touting and will ultimately be asked to pay for. Specifically, the Commission should order the Company to present appropriate metrics with baseline data at the time it seeks recovery of any AGIS investments. By including such metrics, ratepayer advocates and other participants will be able to make recommendations for improvements to those metrics and the appropriate targets. In this way, the Commission will retain the option to condition ultimate recovery of the costs on Xcel achieving measurable non-cost benefits for ratepayers. If ratepayers are ultimately asked to pay for projects that fail to show a net financial benefit, then it makes intuitive sense that they only be required to pay for these investments if they actually realize the purported consumer benefits.

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<sup>7</sup> IDP at 164.

<sup>8</sup> IDP at 164.

Similarly, such cost recovery proposals should be cross-filed in Xcel's ongoing performance metrics docket.<sup>9</sup> In that proceeding, the Commission has adopted a performance incentive mechanism process that contemplates at least the possibility of incentive mechanisms tied to performance metrics.<sup>10</sup> The Commission has selected five outcomes to focus on in the metrics proceeding: affordability, reliability, customer service quality, environmental performance, and cost effective alignment of generation and load.<sup>11</sup> To the extent that improvements in any of those outcomes are used to justify cost recovery of investments with a benefit/cost ratio of less than one, it is important that the record in the metrics docket reflect those investments and justifications. If ratepayers are ultimately asked to pay in full for projects where the costs outweigh the financial benefits because those projects also have purported tangible non-cost benefits, then ratepayers will have effectively already paid for those benefits. It would be inappropriate to, in the metrics proceeding, ask ratepayers to fund these benefits for a second time if they have already paid for them at full cost. Including this information in the metrics docket will ensure that it can be properly accounted for if and when the Commission establishes performance incentives and appropriate targets.

## CONCLUSION

In order to protect ratepayers and ensure that they actually receive the essential non-cost technological investment benefits they will ultimately be asked to pay for, the Commission should require Xcel to include detailed metrics and historical baseline data with any cost

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<sup>9</sup> Docket No. E-002/CI-17-401.

<sup>10</sup> *In the Matter of a Commission Investigation to Identify and Develop Performance Metrics, and Potentially, Incentives for Xcel Energy's Electric Utility Operations*, Docket No. E-002CI-17-401, ORDER ESTABLISHING PERFORMANCE-INCENTIVE MECHANISM PROCESS at 5 (Jan. 8, 2019) [hereinafter Metrics Order].

<sup>11</sup> Metrics Order at 12.

recovery proposals for AGIS and similar investments, and to cross-file those proposals in the ongoing performance metrics docket.

Dated: March 17, 2020

Respectfully submitted,

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Attorney General  
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/s/ **Joseph C. Meyer**

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March 17, 2020

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

**Re: *In the Matter of the Xcel Energy's Integrated Distribution Plan and Advanced Grid Intelligence and Security Certification Request***  
**MPUC Docket No. E002/M-19-666**

Dear Mr. Seuffert:

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

By copy of this letter all parties have been served. An Affidavit of Service is also enclosed.

Sincerely,

/s/ **Joseph C. Meyer**

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Enclosure

**AFFIDAVIT OF SERVICE**

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Grid Intelligence and Security Certification Request***  
**MPUC Docket No. E002/M-19-666**

STATE OF MINNESOTA    )  
  ) ss.  
COUNTY OF RAMSEY    )

I, DEANNA DONNELLY, hereby state that on 17th day of March, 2020, I e-filed with eDockets *Comments of the Office of the Attorney General—Residential Utilities Division*, and served the same upon all parties listed on the attached service list by e-mail, 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/ **Deanna Donnelly**  
DEANNA DONNELLY

Subscribed and sworn to before me on  
this 17th day of March, 2020.

/s/ **Patricia Jotblad**  
Notary Public  
My commission expires: January 31, 2025

[illegible]



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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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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_19-666_M-19-666
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