

May 27, 2020

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

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E002/M-20-421

Dear Mr. Seuffert:

Attached are the comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the following matter:

Advanced Energy Management Alliance's Petition Requesting a Miscellaneous Docket to Direct Xcel Energy to Implement 400 MW of Demand Response by 2023

The Petition was filed on April 14, 2020 by:

Katherine Hamilton
Advanced Energy Management Alliance
1200 18th ST. NW. STE 700
Washington, DC 20036

Ingrid Bjorklund
Bjorklund Law, PLLC
855 Village Center Drive, #256
North Oaks, MN 55127

As discussed in the attached comments, the Department provides its response to the Minnesota Public Utilities Commission's (Commission) April 24, 2020 *Notice of Comment Period*.

The Department **does not take a position on the Petition and will further respond upon reviewing Xcel's response to the Petition**. The Department is available to respond to any questions the Commission may have on this matter.

Sincerely,

/s/ TRICIA DEBLEECKERE
Planning Director

TD/ar
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. E002/M-20-421

I. INTRODUCTION AND SUMMARY OF PETITION

A. BACKGROUND

On January 11, 2017, the Minnesota Public Utilities Commission (Commission) issued its *Order Approving Plan with Modification and Establishing Requirements for Future Resource Plan Filings* (2017 IRP Order). As part of the order, the Commission required that Northern States Power Company, d/b/a Xcel Energy (Xcel) acquire 400 megawatts (MW) of additional demand response by 2023, conduct a study that evaluates the achievability of 1,000 MW of additional demand response by 2025, and file its next resource plan on February 1, 2019 (later extended to July 1, 2019).^{1,2}

On November 12, 2019 the Commission suspended the procedural schedule, allowing Xcel to file a supplement to its IRP.³ On December 6, 2019, the Commission issued a notice requiring Xcel to file the supplement by April 1, 2020.⁴ Subsequently, two extension requests were granted by the Commission; thus, June 30, 2020 is the current IRP supplement (2019 IRP Supplement) due date.⁵

On April 14, 2020, Advanced Energy Management Alliance (AEMA) filed a petition (Petition) requesting that the Commission initiate a proceeding to expedite and ensure Xcel's implementation of 400 MW of additional demand response by 2023.⁶ AEMA is requesting that the Commission open and expedite a miscellaneous docket to adopt a demand response tariff, or tariff revisions. AEMA argued that the proceeding is necessary to develop and adopt a demand response tariff or tariff revisions in a manner timely enough for Xcel to comply with the 2017 IRP Order.

¹ See Commission's [Order Approving Plan with Modifications...](#), Docket No. E002/RP-15-21, January 11, 2017

² See Commission's [Order Extending Deadline](#), Docket No. E002/RP-15-21, January 30, 2019

³ See Commission's [Order](#), Docket No. E002/RP-19-368, November 12, 2019

⁴ See Commission's [Notice of Procedural Schedule](#), Docket No. E002/RP-19-368

⁵ See Commission's [Notice of Extension](#), Docket No. E002/RP-19-368

⁶ See AEMA's [Petition to Initiate M-Docket](#), Docket No. E002/M-20-421

On April 24, 2020, the Commission issued a *Notice of Comment Period* seeking initial and reply comment on the following topics:⁷

- 1) Should the Commission proceed with this miscellaneous docket to expedite Xcel's implementation of incremental demand response?
- 2) On what factual, legal, or other record basis could the Commission conclude that Xcel has not made a good faith effort to comply with the Commission's January 2017 IRP?
 - a) Do parties agree with AEMA that Xcel is at risk of noncompliance with the Commission's January 11, 2017 IRP Order?
 - b) Since Xcel has already been required by the Commission to implement 400 MW of incremental demand response by 2023, do parties agree with AEMA's suggestion that Xcel's 2019 IRP will determine how Xcel will implement its incremental demand response?
- 3) According to Appendix G1 of Xcel's 2019 IRP (Docket No. 19-368), about half of Xcel's required demand response will be included in its 2021-2023 Triennial Conservation Improvement Plan (CIP). How should the Commission consider Xcel's forthcoming CIP in an expedited miscellaneous docket to direct a new demand response tariff?
- 4) Are there benefits (e.g. clarifying Xcel's plans for incremental demand response) to proceeding with a miscellaneous docket even if the Commission does not ultimately direct Xcel to implement new demand response offerings?
- 5) Are there other issues or concerns related to this matter?

B. SUMMARY OF PETITION

AEMA has petitioned the Commission to open a miscellaneous docket to expedite the adoption of a Xcel demand response tariff, or tariff revisions; the tariff is intended to implement at least 400 MW of demand response by 2023 as required by the Commission's 2017 IRP Order.⁸

AEMA argued that unless demand response programs are approved soon, or at a minimum, prior to approval of the next IRP, Xcel's demand response obligation would not be able to be fully subscribed by 2023.⁹ AEMA argued: "[i]t is simply not feasible for demand response programs to be developed or expanded, filed, approved, and marketed to and subscribed by customers in one year."¹⁰

AEMA stated that opening a miscellaneous docket would: 1) allow for a determination of what demand response offerings Xcel would provide, and 2) establish tariff revisions to implement the programs. AEMA noted that neither the next IRP, nor the anticipated rate case would allow for the necessary focus on the demand response offerings – a focus that a miscellaneous docket would provide.¹¹

⁷ See Commission's [Notice of Comment Period](#), Docket No. E002/M-20-421

⁸ AEMA Petition, at 11

⁹ Id. at 5

¹⁰ Id. at 5-6

¹¹ Id. at 9-10

II. DEPARTMENT ANALYSIS

A. GOVERNING STATUTES AND RULES

The Department understands that the Commission is processing the AEMA Petition as a miscellaneous filing pursuant to Minn. Rule 7829.1300 and, therefore, provides the following evaluation of the content requirements required for that filing type.

1. *Minn. Rule 7829.1300 – Miscellaneous Filings*

Minn. Rule 7829.1300 requires that the party making the filing must include a one-page summary of the filing and include certain content requirements (contact information, controlling timing statutes, a description of the impacts of the filing, the impacts on rates and on persons, and reasons for the filing, among other items).¹² The filing is required to be served on the applicable general service list.

As to the content requirements, many of the requirements pertain to a utility filing – such as the dates for proposed service or rate changes, or the utility contact persons, etc. and therefore, do not directly apply here. The Department has reviewed the filing requirements and to the extent they can or do apply, the Department concludes that the AEMA Petition is sufficiently complete.

Additionally, the petition was served to the 102 persons on the current Xcel IRP official service list. The Department concludes that sufficient service was provided for a miscellaneous filing.

B. *SHOULD THE COMMISSION PROCEED WITH THIS MISCELLANEOUS DOCKET TO EXPEDITE XCEL'S IMPLEMENTATION OF INCREMENTAL DEMAND RESPONSE?*

In consideration of whether the Commission should open a miscellaneous docket in response to the AEMA Petition, the Department analyzed the scenarios in which this may be necessary: if the Commission finds that the development of demand response offerings is insufficient or if the speed at which Xcel is proposing to implement the products is insufficient (and therefore needs expediting).

AEMA expressed concerns regarding both the development of demand response products as well as ensuring the products would be established, approved, and subscribed in a timely manner. Relatedly, AEMA relayed that Xcel's demand response stakeholder workshops were convened at Xcel's request to meet certain goals and to provide a foundational understanding of new and updated demand response options, examine opportunities and challenges and any necessary policy changes (among other goals).¹³ Through the stakeholder process several demand response design principles were established and the objectives expected to be reflected in Xcel's demand response filings were identified. However, Xcel did not provide sufficient details or information around demand response products it

¹² Minn. Rule [7829.1300](#)

¹³ AEMA Petition, Attachment A at 6

intended to pursue. Due to the lack of product detail and information, AEMA argued that the stakeholders were not able to evaluate or provide feedback on potential demand response offerings as intended; therefore, the development of Xcel's demand response products was hampered.¹⁴ Further, AEMA noted that no demand response offerings have been filed with the Commission following the close of the workshops in January 2019.¹⁵

The Department notes that in January 2019, the Brattle Group released its study, *The Potential for Load Flexibility in Xcel Energy's Northern States Power Service Territory* (Brattle Group Study). Following, on January 22, 2019, Xcel, Great Plains Institute (GPI) and the Center for Energy and the Environment (CEE) concluded the stakeholder workshops with the seventh workshop; the workshop included an overview of the Brattle Group Study results. Later, in May 2019, GPI and CEE published the stakeholder summary report, *Xcel Energy Demand Response Offerings: 2017-2019 Stakeholder Engagement Process Summary Report* (DR Stakeholder Summary). The DR Stakeholder Summary provided anticipated next steps for Xcel:¹⁶

There are multiple next steps for Xcel Energy's demand response offerings for Minnesota. The portfolio as a whole will be considered in Xcel Energy's next [July 2019] Integrated Resource Plan filing, with an assumption of deploying enough DR to meet the Commission's requirement by 2023 for at least one of the plan options. The individual demand response programs that will be deployed to achieve that requirement are currently in development and will be brought forth for regulatory approval, though the exact details of regulatory consideration were not available at the time of these stakeholder meetings.

The Department notes that Xcel included in its July 2019 IRP filing an overview of the trajectory and development of programs, including dates by which estimated demand response MW are proposed to be online.¹⁷

¹⁴ AEMA Petition, at 5

¹⁵ Id. at 6

¹⁶ Id. at Attachment A at 23

¹⁷ Xcel 2019 IRP, Appendix G1, at 17

Table 1: Demand Response Five-Year Action Plan

	Program	Regulatory Path	Status	Actuals ¹⁸	Estimated Cumulative Potential (Gen. MW)				
				2019	2019	2020	2021	2022	2023
Existing Programs	Electric Rate Savings	CIP (admin); Rate Case (discounts)	Existing Program	461	-	462	464	465	466
	Saver's Switch	CIP (admin); Rate Case (discounts)	Existing Program	433	-	447	461	474	491
	Subtotal Existing			894	-	909	925	939	957
Expanded and New Programs	A/C Rewards (Smart Thermostats)	CIP	Modified in 2020 Extension Plan	3	13	23	98	103	114
	Small Business Smart Thermostats	CIP	Testing – Summer 2019; 2021-2023 Triennial Plan Filing	0	0	0	1	2	3
	Peak Partner Rewards	CIP	2020 Extension Plan	0	0	14	45	45	45
	Two way switches – Saver's Switch Technology Update	CIP	2021-2023 Triennial Plan Filing	0	0	0	0	0	19
	Interruptible Tariff(s)	Rate Case or Miscellaneous Filing	In design - Tariff Filing 2019/2020	0	0	0	40	90	115
	Subtotal Expanded and New			3	13	37	184	240	296
Non-Traditional Programs	Grid Enabled Electric Water Heaters	Non-Traditional - TBD	In design	0	0	0	4	9	13
	Commercial Building Controls (Auto DR)	Non-Traditional - TBD	In design - Currently not cost-effective ¹⁹	0	0	10	13	15	22
	Other	Non-Traditional - TBD	In design	-	-	-	-	-	-
	Subtotal Non-Traditional			0	0	10	17	24	35
Total Existing, Expanded, New, and Non-Traditional Programs				897	907	956	1,126	1,203	1,288
Incremental Program Capacity (Gen. MW)				-	-	-	-	-	391
Incremental Program Capacity with Reserve Margin (MW)				-	-	-	-	-	400

Xcel appears to be on track to meet their own schedule. As for the current years, 2019 and 2020, Xcel has included additional demand response in the categories of A/C Rewards and Peak Partner Rewards. These programs are noted as modified in Xcel's Conservation Improvement Program (CIP) 2020 Extension Plan filed on July 1, 2019.¹⁸

Xcel's 2019 IRP Supplement is expected to be filed on June 30, 2020; the Department anticipates the 2019 IRP Supplement will include an update as to Xcel's demand response products and compliance status and will provide further insight into Xcel's progress. Additionally, Xcel's 2021-2023 Triennial CIP filing date has been extended to July 1, 2020.¹⁹ As seen above in Table 1, the 2021-2023 Triennial CIP will also enable an accurate assessment on whether Xcel is on-track to meet its 2023 obligations. Both of these near-term filings are likely to provide additional relevant information to inform a better assessment of Xcel's compliance progress than is in hand today.

¹⁸ See Xcel's Compliance Filing - [2020 CIP Extension Plan](#), Docket No. E002/CIP-16-115, July 1, 2019

¹⁹ See Docket CIP-20-473; See the Department's [Timeline Modification](#), Docket E002/M-20-421, May 22, 2020

Last, if later found not to be on track to be in compliance with the 2017 IRP Order, or if the Commission later finds that Xcel is not moving as expeditiously with demand response offerings as was expected, the Commission has the ability to reopen and/or initiate proceedings on its own motion pursuant to Minn. Stat. § 216B.25.

Overall, the Department supports AEMA's efforts to ensure that Xcel remains in compliance with the Commission's orders. However, at this time the Department does not have reason to conclude that Xcel is not on track to meet its demand response obligations. Further, two filings will shortly be available that are expected to provide additional and updated information about the status of Xcel's demand response procurement.

The Department refrains from making a recommendation on how to proceed at this time, but will provide further comments after reviewing Xcel's response to the AEMA Petition.

C. ON WHAT FACTUAL, LEGAL, OR OTHER RECORD BASIS COULD THE COMMISSION CONCLUDE THAT XCEL HAS NOT MADE A GOOD FAITH EFFORT TO COMPLY WITH THE COMMISSION'S JANUARY 2017 IRP?

At this time, the Department cannot conclude that Xcel will not meet its 2023 demand response obligations. Instead, from information filed by Xcel (in the 2019 IRP, noted above) it appears that Xcel has developed a comprehensive plan, is on track to meet those obligations, and intends to comply:²⁰

We are committed to securing an additional 400 MW of demand response by 2023; however, for a demand response portfolio to be successful, we need the flexibility to procure resources as needed to maximize all benefits – including benefits outside traditional demand response. Some additional demand response can be implemented through existing mechanisms. Other programs may require new cost-recovery opportunities, and we are committed to working with stakeholders to identify these. Additionally, we believe battery storage may be a resource we could use to meet demand response needs, and we propose allowing incremental storage to meet some portion of the 400 MW requirement.

Xcel explained in its 2019 IRP why some of its proposed demand response offerings are currently not least-cost resources (but are still being pursued and included in Xcel's plans).²¹ The Department expects an update in both the 2019 IRP Supplement and the 2021-2023 Triennial CIP which will provide more information and context about Xcel's efforts to comply with the Commission's 2017 IRP Order.

²⁰ Xcel 2019 IRP, Appendix G1, at 2

²¹ Id. at 2

1. *Do parties agree with AEMA that Xcel is at risk of noncompliance with the Commission's January 11, 2017 IRP Order?*

Until Xcel fully subscribes the 400 MW of demand response, it is at risk of non-compliance with the Commission's order. However, AEMA's Petition outlined a timeframe as support for its belief that any further delay could risk non-compliance.²²

Table 2. AEMA Demand Response Procurement and Implementation Timeline

Sample Timeline for Demand Response Implementation	Timeframe
Further Program Development (e.g., continuation of workgroup and public comments)	Q3 - Q4 2020
Xcel Program Filing(s) with Commission	Q1 2021
Public Comment Period	Q1 - Q2 2021
Commission Approval	Q2 2021
Program Implementation	Q2 - Q3 2021
Program Growth Ramp to 100MW	Q3 - Q4 2021
Program Growth Ramp to 200MW	Q4 2021 - Q2 2022
Program Growth Ramp to 400MW	Q2 2022 - Q1 2023

The schedule shows that AEMA expects Xcel to submit program filings in Q1 2021. This schedule largely aligns with Xcel's 2019 IRP Table 1, above, which indicates the timing for increased existing programs, new and expanded existing programs, and non-traditional demand response offerings.

The only line item that does not appear to be on-track in Xcel's Table 1, is the Commercial Building Control (Auto DR) that is listed as 'in-design'. The program is responsible for 10 MW of demand response in 2020; therefore, only 4 percent of the total required demand response may be delayed to a later year within the compliance period. Therefore, the Department concludes that Xcel is not at substantial risk of non-compliance at this time.

2. *Since Xcel has already been required by the Commission to implement 400 MW of incremental demand response by 2023, do parties agree with AEMA's suggestion that Xcel's 2019 IRP will determine how Xcel will implement its incremental demand response?*

Under current modeling practices, the Commission-ordered 400 MW of demand response capacity will be locked into the IRP modeling—a required addition. However, since AEMA has suggested that Xcel may not be able to meet the Commission's 2023 deadline, parties may analyze the consequences of Xcel failing to fully comply with the 2017 IRP Order by studying various scenarios that modify the "locked-in" 400 MW. Thus, the analyses done for the purposes of the 2019 IRP Supplement may inform Xcel and the Commission on the size, type, and timing of Xcel's capacity needs, including the ordered demand response. Of course, the IRP analysis will not determine how additional demand response capacity is acquired, but the IRP analysis would show how demand response resources impact the items in the five-year action plan.

²² AEMA Petition, at 7

D. ACCORDING TO APPENDIX G1 OF XCEL'S 2019 IRP (DOCKET NO. 19-368), ABOUT HALF OF XCEL'S REQUIRED DEMAND RESPONSE WILL BE INCLUDED IN ITS 2021-2023 TRIENNIAL CIP. HOW SHOULD THE COMMISSION CONSIDER XCEL'S FORTHCOMING CIP IN AN EXPEDITED MISCELLANEOUS DOCKET TO DIRECT A NEW DEMAND RESPONSE TARIFF?

As noted by Xcel, demand-side management (DSM) offerings and products that qualify for CIP provide an avenue for cost recovery (through the Conservation Cost Recovery Charge and the Conservation Cost Recovery Adjustment), whereas cost recovery for DSM products that are non-CIP eligible must be sought through specific tariff offerings (or other means).²³ Therefore, there is more certainty, and thus incentive, for Xcel to find projects that are CIP-qualifying. To the extent that Xcel elects to use CIP-qualifying products (as they note they intend to do for a large portion of their IRP-required demand response obligation), those products would be evaluated and approved by the Department and would not need to be evaluated through a Commission miscellaneous docket. However, any Commission demand response tariff proceeding should be informed of those CIP-qualifying proposals to ensure there is not redundancy or overlapping of products or energy and cost accounting among proposed CIP products and/or any tariffed rates.

E. ARE THERE BENEFITS (E.G. CLARIFYING XCEL'S PLANS FOR INCREMENTAL DEMAND RESPONSE) TO PROCEEDING WITH A MISCELLANEOUS DOCKET EVEN IF THE COMMISSION DOES NOT ULTIMATELY DIRECT XCEL TO IMPLEMENT NEW DEMAND RESPONSE OFFERINGS?

The Department agrees with AEMA both that demand response programs take time for the programs to be developed, marketed, and fully subscribed and that demand response resources can be used as scalable short- and long-term resources.²⁴ Currently, there is no method for the Commission to monitor or review the progress being made by Xcel to implement the 400 MW of demand response.

In any circumstance, the Department concludes that it is reasonable for the Commission to establish a compliance filing requirement for Xcel - either in this docket, in a new standalone docket, or as part of the 2019 IRP docket - to monitor Xcel's progress in achieving its demand response requirements. Such a compliance filing should include information such as:

- status of stakeholder meetings (if any)
- list of expected product offerings (similar to Table 1, above)
- status of product offering development
- date, or estimated date, of regulatory filing
- implementation status
- subscription level status and forecasts
- time-of-use and critical peak pricing product status or learnings from Advanced Metering Infrastructure pilots

²³ Xcel 2019 IRP, Appendix G1, at _____

²⁴ AEMA Petition at 6 and 8

The Commission and stakeholders would use this compliance filing to monitor Xcel's progress and, if needed, as an impetus to take further action. The Commission at that time could assess what, if anything, is needed and would have the option to take any necessary action. For example, the Commission could open a proceeding investigating Xcel's progress in meeting the demand response obligations, initiate a proceeding to evaluate the adoption of a demand response tariff (as suggested by AEMA), establish requirements for a competitive bidding process for demand response (similar to requirements for Minnesota Power), or take other action.

Given the timing of the expected 2019 IRP Supplement and 2021-2023 Triennial CIP Plan, the Department suggests that these compliance reports could be filed on February 1, 2021 and February 1, 2022.

F. ARE THERE OTHER ISSUES OR CONCERNS RELATED TO THIS MATTER?

The Department has no other issues or concerns with this matter.

III. DEPARTMENT RECOMMENDATIONS

The Department does not take a position on the AEMA Petition at this time and will further respond upon reviewing Xcel's response to the Petition.

/ar

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

Minnesota Department of Commerce
Comments

Docket No. E002/M-20-421

Dated this **27th** day of **May 2020**

/s/Sharon Ferguson

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