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May 27, 2020

—Via Electronic Filing—

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

RE: COMMENTS
AEMA'S PETITION REQUESTING A MISCELLANEOUS DOCKET TO DIRECT
XCEL ENERGY TO IMPLEMENT 400 MW OF DEMAND RESPONSE BY 2023
DOCKET NO. E002/M-20-421

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission the enclosed Comments in response to AEMA's April 14, 2020 Petition and in accordance with the Commission's April 24, 2020 Notice of Comment Period.

Pursuant to Minn. Stat. § 216.17, subd. 3, we have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list. Please contact Jessica Peterson at (612) 330-6850 or jessica.k.peterson@xcelenergy.com if you have any questions regarding this filing.

Sincerely,

/s/

SHAWN WHITE
MANAGER, DSM & RENEWABLE REGULATORY STRATEGY AND PLANNING

Enclosure
c: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

IN THE MATTER OF AEMA’S PETITION
REQUESTING A MISCELLANEOUS DOCKET
TO DIRECT XCEL ENERGY TO IMPLEMENT
400 MW OF DEMAND RESPONSE BY 2023

DOCKET No. E002/M-20-421

COMMENTS

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission (Commission) these Comments in response to the Advanced Energy Management Alliance’s (AEMA’s) April 14, 2020 Petition and in accordance with the Commission’s April 24, 2020 Notice of Comment Period.

In its January 11, 2017 Order (January 2017 Order), in Docket No. E002/RP-15-21, the Commission required Xcel Energy to acquire no less than 400 MW of additional demand response by 2023.¹ We appreciate AEMA’s interest in seeing the Company achieve this goal and, as discussed in our *2020-2034 Upper Midwest Resource Plan* (2020-2034 IRP), we have a plan for adding additional demand response, and have taken necessary steps to do so. The Preferred Plan in the 2020-2034 IRP includes 400 MW of incremental demand response resources and lays out a five-year action plan to add these resources. In addition, the Company has filed various details regarding our planning process and ongoing efforts to achieve the 400 MW target in a number of dockets, including our Integrated Distribution Plan and Conservation Improvement Plans (CIP).

Since the Commission issued the January 2017 Order, the Company has taken the necessary steps to add incremental demand response resources. We have taken a

¹ The Commission’s Order does not specify a basis for measuring the 400 MW. We have assumed this requirement to be a capacity equivalent number, grossed up for line losses and reserve requirements. After accounting for reserve requirements, this is equivalent to 391 MW of generation (Gen. MW).

measured approach in order to take the time to identify the right opportunities as new technologies have come to market and the Company's plans for modernized meters have crystalized. Among other things, since 2017, we have completed a cost-effective analysis of potential demand response opportunities and repeatedly engaged stakeholders to discuss program participation and how to move efficiently towards new and innovative technologies and program designs. Additionally, we have held numerous customer discussions regarding flexibility and optionality in our demand response portfolio. At the conclusion of our stakeholder discussions, we began to work towards implementation of these new products and programs. Further, the Company has increased demand response resources by 73 Gen. MW since 2018.

In 2020, we launched two new demand response programs: Peak Partner Rewards and AC Rewards Small Business. In addition, we continue to expand our AC Rewards Residential program in other parts of our NSP System service area, including in both Wisconsin and South Dakota. We have also begun pilots across our territory determining the interest in newer technologies such as air-source heat pumps, grid-operated electric water heaters, and rates combined with behavioral demand response. These efforts will continue to expand our reach to customers interested in decreasing their load during certain times of the day or during a control event launched by the Company.

The Company has taken appropriate steps to achieve 400 MW of additional demand response by 2023 and we will continue doing so consistent with the plan laid out in the 2020-2034 IRP. We appreciate AEMA's interest in our demand response plan and offerings, but the requested process in this Miscellaneous Docket is not necessary to assure we achieve our incremental demand response targets. Further requiring the Company to follow the strict schedule laid out in AEMA's Petition could unintentionally constrain our ability to bring demand response offerings forward through development.

The Commission's Notice requests comments on the following topics:

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?
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?

In these Comments, we discuss our progress towards achieving the 400 MW of incremental demand response and our plans going forward, and we provide specific comment on the Commission topics detailed above.

COMMENTS

I. XCEL ENERGY'S DEMAND RESPONSE PORTFOLIO

In the January 2017 Order, Docket No. E002/RP-15-21, the Commission required Xcel Energy to acquire no less than 400 MW of additional demand response by 2023. In 2017, we initiated an update to the 2014 potential study conducted for our NSP service territory that provided us a list of demand response opportunities that were cost effective compared to other similar resources. The analysis conducted by The Brattle Group also focused on expanding the scope of the term "cost-effective" in order to incorporate flexible demand response opportunities.² Then the Company, in partnership with Center for Energy and Environment and Great Plains Institute, conducted seven meetings between December 2017 to January 2019 exploring further opportunities to engage customers and increase demand response in Xcel Energy's service territory. We filed our five-year, 2019-2023 action plans as a result of these early efforts as part of the 2020-2034 IRP.

The Company will include an update on our demand response plans in the supplement we will file on June 30; but note our progress by 73 Gen MW since 2018. We continue to work towards developing new products and opportunities for customer demand response participation in: expansion of existing programs where appropriate, addition of new traditional programs and tariffs, and addition of non-traditional opportunities.

² *The Potential for Load Flexibility in Xcel Energy's Northern States Power Service Territory*, The Brattle Group, June 2019. See, Xcel Energy's 2020-2034 Upper Midwest Resource Plan. Docket No. E002/RP-19-368. July 1, 2019. Appendix G3: DR Cost Effectiveness at NSP (Brattle).

A. Progress Towards Incremental 400 MW of Demand Response

Demand response resources generally can be grouped into two buckets: traditional and non-traditional resources:

- **Traditional demand response**, often referred to as load management, provides a temporary reduction to system peak. Often these products are referred to as dispatchable resources because the utility may control them directly. This peak reduction has a similar impact on our system as a combustion turbine (CT) because it can be brought on- and off-line quickly for short periods of time as an operational reserve.
- **Non-traditional demand response**, often referred to as demand management, provides the opportunity for our customers to plan for and manage their electric demand differently. Compared to traditional methods of peak demand reduction during the hottest days of year, these methods allow customers to shift portions of their electric loads to lower-cost periods of the day when carbon-free generation is highest. As noted by Lawrence Berkeley National Laboratory, in systems with high renewable penetration, demand management can unlock customer benefits like production cost savings of renewable resources.³

The Company's comprehensive demand response plan includes both traditional (through existing and new programs) and non-traditional programs and measures. Through this broad suite of offerings, we are exploring new technologies and strategically focusing on shifting demand to certain times of the day. In addition, we continue to look towards opportunities to pilot opportunities with customers and to quickly move products to customer adoption.

In Table 1 below, we provide an update to the actual load availability in 2019 and our current incremental growth forecast as of March 2020. We note that, although we saw a drop in controllable load in 2018, we have since seen expansion of our programs by 73 Gen. MW, and we are forecasting growth over the next three years sufficient to meet the January 2017 Order's target. Attrition of demand response occurs on a regular basis as customers reduce and increase their controllable load. However, the drop in demand for 2018 was due to both attrition and a result of a change in our methodology for calculating interruptible demand calculations that was more useful to the Midcontinent Independent System Operator.

³ Lawrence Berkley national Laboratory: 2025 California Demand Response Potential Study (Charting California's Demand Response Future), March 1, 2017. (<http://www.cpuc.ca.gov/General.aspx?id=10622>)

**Table 1: Xcel Energy Demand Response Portfolio (Gen. MW)
March 2020 Estimates⁴**

	2017 Actual	2018 Actual	2019 Actual	2020 <i>Forecast</i>	2021 <i>Forecast</i>	2022 <i>Forecast</i>	2023 <i>Forecast</i>
Total Controllable Load	851	824	897	1,010	1,158	1,231	1,304
Cumulative Incremental Load	0	(27)	46	159	307	380	453

B. Potential Study Analysis

In 2017, we engaged The Brattle Group to analyze the benefits of demand response. The Brattle Group’s report, *The Potential for Load Flexibility in Xcel Energy’s Northern States Power Territory* (“Potential Study”), estimated the potential capabilities of cost-effective demand response that could be deployed in Xcel Energy’s Northern States Power service territory, including Minnesota, North Dakota, South Dakota and Wisconsin.⁵ The study focused on the addition of non-traditional demand response resources. The study did not, however, address incremental demand from existing customers or the impact of customers limiting or ceasing participation in the future. In other words, existing program participation was a constant value.

The Potential Study reached several conclusions regarding potential, and identified a list of products/opportunities that could be cost-effective compared to an avoided combustion turbine. The study further identified additional benefits that could be achieved with advanced non-traditional demand response products including: Geo-targeted distribution capacity investment deferral, ancillary services and load building/valley filing (shifting on-peak load to off-peak hours).

This study helped identify the best opportunities for the Company to focus on for the developmental efforts including specific programs and markets such as mid-market customers who traditionally had less participation in demand response programs.

⁴ This forecast is as of March 2020. The Company intends to file an updated five year action plan in their June 20, 2020 filing in Docket No. E002/RP-19-368. While we believe the overall forecast is achievable, we anticipate the actual forecasts per year to differ as the results of the COVID-19 pandemic are realized.

⁵ *The Potential for Load Flexibility in Xcel Energy’s Northern States Power Service Territory*, The Brattle Group, June 2019. See, Xcel Energy’s 2020-2034 Upper Midwest Resource Plan. Docket No. E002/RP-19-368. July 1, 2019. Appendix G3: DR Cost Effectiveness at NSP (The Brattle Group).

C. Stakeholder Engagement

We engaged stakeholders early on in our process to obtain insights that could inform the potential study analysis and future portfolio planning. The Company hired Great Plans Institute and the Center for Energy and Environment to lead seven demand response stakeholder discussions between December 2017 and January 2019.⁶ We began these stakeholder meetings focused on the best ways to view cost-effectiveness, market impact and challenges to demand response growth. Then, we discussed the specific requirements new program offerings should include, what products were under development and how these met the identified criteria. We began laying out this plan and discussed several potential products with stakeholders in our final stakeholder workshop in January 2019. We received feedback on approximately 20 programs or measures.

Based on these discussions, we developed the comprehensive plan laid out in the 2020-2034 IRP, which carefully considers appropriate compensation, clear expectations and flexibility for customers to achieve participation sufficient to satisfy our obligation under the January 2017 Order.

The Company continued to review comprehensive cost-effectiveness and our objectives while developing products. Some products have fallen off our original list while others are being piloted (including in Colorado, where AMI meters have begun being installed) to verify cost-effectiveness. Four of these offerings have launched in whole or part, and we are preparing to file petitions for approval of at least one more product with the Commission this fall.

Finally, as the Company has been developing specific offerings, we have been working with customers so that we do not bring unknown products to market. Before we launch a product, we are already aware of customers interested in moving forward. These close relationships with our customers allow us to expand new measures and products quickly.

⁶ In addition to our workshops in connection with the IRP, stakeholders have had the opportunity to participate in several related dockets in which the future of demand response has been discussed. These discussions including future tracking of demand response efforts and the overall impact of load reduction to the grid (Docket No. E002/CI-17-401), the impact of specific customer rates and behavioral opportunities for customers and how demand response can impact the distribution grid (Docket No. E002/M-19-666)), and the potential for demand response reduction in time-of-use rates (Docket Nos. E002/M-17-775 & E002/M-20-86) as well as with electric vehicles (various dockets). In addition, several products and measures have been approved by the Department of Commerce in our CIP proceedings.

D. Program Growth

Of the products presented on January 22, 2019 to Stakeholders, the Company has moved forward with several and is working on others. Table 2 provides an update to our development document.⁷

Table 2: Updated “Summary of Xcel Energy Demand Response Offerings in Development”

Program Type	Product	Est. Date	Status
Behavioral DR	“Hands-off” DR	2023	Piloting in CO, potential pilot to begin in late 2020 in MN Technology dependent
Commercial Building Controls	Commercial Buildings	2021	Technology dependent
Critical Peak Pricing	Critical Peak Pricing (Opt-in)	2022	Reviewing CO program to determine MN benefit
Electric Vehicles	Smart Charging	2020	Program denied through CIP – exploring further opportunities
Interruptible Offerings	Peak Partner Rewards (PPR)	2020	PPR launched in 2020
Interruptible Offerings	Interruptible Rate	2022	Interruptible Rate to be filed in Fall 2020
Other	Geo-Targeting	2023	Pilot for Geo-Targeting to be complete in 2020 – additional development efforts to launch as a result.
Other	Reverse DR	2024	Reverse DR to be piloted in CO.
Smart Thermostats	Expand current offering	2021	Launched 2020 (two additional states)
Smart Thermostats	Home Energy Management	2024	Piloting in 2020
Smart Thermostats	Optimization	2020	Launched 2020
Smart Water Heating	Electric Water Heating Control	2023	Partially launched in 2020 2021 additional phase
Saver’s Switch Update	2-way communication	2021	Technology dependent

Below, we provide specific detail regarding actions taken since 2017 with respect to our demand response portfolio.

⁷ See, Xcel Energy’s 2020-2034 Upper Midwest Resource Plan. Docket No. E002/RP-19-368. July 1, 2019. Appendix G4: DR Stakeholder Engagement Summary (GPI).

1. *Existing Programs*

The Company has a robust traditional demand response portfolio that is the eighth largest among all US investor-owned utilities (IOUs), as a percentage of peak demand.⁸ The core around which we intend to achieve the 400 MW of demand response by 2023 is expansion of our existing programs. These programs saw an increase in demand response load by existing customers as well as new customers in all of our Midwestern states over the last year. And, through the expansion of participation in these programs, we saw 73 Gen. MW of demand response added since 2018.

We have had a significant extension of our AC Rewards program for 2020 that includes launching the program in two additional states: Wisconsin and South Dakota. Further, we continue to work with new and existing partners to install smart thermostats in homes and sign customers up for demand response through the AC Rewards program. We also have expanded the AC Rewards program to include thermostat optimization, which will maximize savings for customers.

2. *New Traditional Offerings*

Around the core of our existing programs, we are proposing a number of new traditional demand response offerings. We chose to first focus on the increase of opportunities for those customers in the mid-market segment. The Potential Study found that this group of customers had the most potential and was underserved by the current programs in market.⁹ In order to meet this segment's needs, we launched two new options for the 2020 summer control season: Peak Partner Rewards (PPR) and AC Rewards for Business.

PPR, launched in March 2020, is a new program which offers bill credits and access to electric load profile data to business customers that agree to reduce their electrical loads when the electric grid experiences peak demand periods. The program's incentive structure emphasizes actual performance during control periods. These incentives are provided through CIP, and savings are identified through electric load profile data.

AC Rewards for Business – started as a pilot program with 400 enrollees in 2019 – officially launched under the Saver's Switch for Business program beginning in May

⁸ *The Potential for Load Flexibility in Xcel Energy's Northern States Power Service Territory*, The Brattle Group, June 2019.

⁹ *Id.*

2020. The measure expands our existing AC Rewards program into the commercial space, through direct installation of smart thermostats. Customers receive a smart thermostat for free through the program, in addition to a \$25 bill credit for participating in demand response. The speed with which we were able to transition from a pilot to a full launch is a result of early customer engagement.

These two products were approved by the Department of Commerce (DOC) through our CIP program. CIP products are approved through the procedures and processes outlined in Minn. Stat. 216B.241 and require no additional Commission approval.¹⁰

In addition to these two offerings, we are in the process of developing an interruptible rate program that would allow increased flexibility, economic pricing and buy-through rates. We intend to file this as soon as early fall as cost-recovery and operation details are finalized. This program will be utilized similarly to the current Electric Rate Savings program however it will allow for a wider range of response and control options, including buy-through offerings and seasonal control, along with increased data access for participating customers.

3. Non-Traditional Opportunities

In addition to expanding our existing programs and proposing new traditional demand-response offerings, we also plan to pilot non-traditional opportunities and new technologies to satisfy the January 2017 Order. These additional opportunities for demand response are tied to increasing implementation of new technologies, such as EVs and advanced metering infrastructure. Smart charging and load management could enable demand response opportunities, through time-of-use rates and peak time rebates. All of our EV programs and tariffs in Minnesota—including the recently-approved expansion of our Residential EV Home Service program—include time-of-use rate structures. Similarly, we are piloting new whole-home time-of-use rates in connection with advanced meters, and are planning similar advanced rates when we roll out advanced meters across our entire service territory.

The specific MW demand response achievements of these programs can be difficult to calculate. However, we plan to include these efforts as part of our demand response goals as technology deployment evolves.

Finally, as we complete our 2021-2023 Minnesota Triennial CIP filing, we have identified new demand response measures that will help push us towards the utilization of new technologies such as grid connected water heaters and water pumps

¹⁰ Docket No. E,G002/CIP-16-115

that not only can be utilized during a control event, but also adjust temperature during the day to shift load to times where renewable energy costs are highest.

E. Recent Challenges

The Company has taken, and will continue to take, significant steps to achieve 400 MW of additional demand response by 2023, and we continue to believe this is an achievable target. We note, however, that unforeseeable and significant economic changes resulting from the COVID-19 pandemic will undoubtedly affect implementation of these plans. This crisis has not impacted all customers equally, and the full extent of its impacts remains unknown. Some business customers have lower to no demand as a result of temporary shut downs, while others have increased demand, but are unable to allow load control because they are providing essential and critical production and services. We have taken a number of actions to mitigate financial impacts to our customers, including flexing customer payment requirements, halting credit actions, and instituting a no disconnections policy. While it is too early to determine the full impact of the pandemic, we have experienced and continue to anticipate a temporary loss of demand response participation from both residential and business customers over the next several months impacting our 2020 forecast.

Despite these challenges, however, we are taking action to help our customers through this crisis while maintaining our focus towards growth of the portfolio through the following actions:

- Through virtual visits, we will offer smart thermostats to residential and small business customers, continuing our efforts to grow demand response in these segments;
- We will target our PPR program towards specific customer groups, to allow our account managers and small business representatives to offer the program to customers who would receive the most benefit, rather than utilizing mass marketing that might detract from other COVID-19 related communications;
- We continue to install Saver Switches and remote terminal units (RTUs) as part of program implementation, ordering technology ahead of time to prepare for the summer control season;
- In a recent Petition, we request that the Commission allow relief from tariff requirements for customers on existing rates, allowing them to remain on the program under new conditions,¹¹ and

¹¹ *In the Matter of the Petition of Northern States Power Company for Approval of a One-Tie Waiver to the Company Tariff Requirements for Peak Control Services*, Xcel Energy. Docket No. E002/M-20-503. (May 21, 2020)

- We continue to develop new potential program offerings as we explore opportunities that could help customers manage future energy costs.

We will provide additional context on the effects of COVID-19 on demand response goal achievement in future filings.

Despite these challenges, we continue to take responsible action towards achieving 400 MW of additional demand response by 2023 through the steps laid out above. Our comprehensive plan can be addressed and acted upon without additional stakeholder discussion outside active comment periods and those that will take place with upcoming tariff filings. With our active progress, we believe we are well-positioned to achieve the 400 MW of demand response ordered by the Commission. Therefore, we do not believe any additional process in this docket is necessary.

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

As discussed above, the Company has provided the Commission with a comprehensive plan outlining our goals and plans towards reaching an incremental demand response goal of 400 MW by 2023. We continue to make progress and take actions to achieve the goals set out in this plan, and we look forward to providing the Commission an update on June 30 in our IRP Supplement. We believe additional process in this Miscellaneous Filing is unnecessary at this time, given the progress made to date, and would only complicate and potentially slow down the process toward achieving the demand response goal. The appropriate next steps are for the Company to propose planned programs this fall, and stakeholders can provide feedback on those specific tariffs and programs in the relevant dockets.

III. 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?

As discussed above, the Company has taken significant steps, and is on track, to achieve the addition of 400 MW of incremental demand response resources by 2023.

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

Although we cannot completely eliminate all risk that the Company may not achieve the full 400 MW of demand response, including impacts from the COVID-19 pandemic, we do not believe this is significant at this time. The Company is committed to meeting this goal. As identified in our detailed five-year action plan and further in these Comments, the Company achieved 73 MW of incremental demand response through expansion of existing programs. Moreover, we continue to make significant strides towards launching new programs that provide customers flexibility and control. Several of our programs (or new measures) have already been launched, are in a pilot stage or nearing completion of development.

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?

An integrated resource plan is intended to indicate size, type and timing of resources. As part of this process, we have filed our 2020-2034 IRP plan to include an additional 400 MW of demand response per the Commission's Order.

Other regulatory processes are intended to determine how the Company implements demand response procurement (or programs) once a need has been indicated in the IRP. These could include through our CIP program process, or through petitions to the Commission requesting approval of particular offerings.

IV. 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?

There is no need for an expedited Miscellaneous Docket as provided in detail above.

We believe it is important to deliver innovative demand response programs that result in quantifiable cost-effective energy savings and system benefits for our customers. One way to provide these comprehensive benefits is to align demand response with our energy efficiency portfolio to maximize customer benefits and provide programs that are easy for customers to understand and participate in. One way to meet these

requirements is to launch programs through our CIP Portfolio. The Company has already received approval to launch our Peak Partner Rewards program through CIP whereas the DOC approved the offering and parties commented on the importance of providing these types of flexible programs for demand response.¹² This program joins several other demand response programs in our CIP Portfolio including, the Residential Demand Response, Electric Rate Savings and Saver's Switch for Business®. The Company has already received approval to launch our Peak Partner Rewards program through CIP.

Any additional demand response programs or measures the program intends to launch as part of the CIP portfolio will be included in our upcoming 2021-2023 CIP Triennial Plan, which will be filed on or before July 1, 2020 in Docket No. E, G002/CIP-20-473. These programs are usually approved prior to upcoming program year. During the course of our 2021-2023 CIP Triennial Plan, new programs can also be proposed in a CIP modification request, which is reviewed and approved by the DOC within a 60-day timeframe. This allows for an expedited review and moves products to market quickly. Since much of our resource can be procured through CIP measures, and are already in place, timing of additional filings should not hold up the procurement of future resources prior to the end of 2023.

V. 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 Company believes that we have provided sufficient clarification regarding our plans to meet the Commissions 400 MW target. Although we appreciate the interest in seeing we achieve our demand response goals, we are concerned that an additional Miscellaneous Filing could potentially slow our implementation of demand response efforts through duplicative regulatory process, in addition to active proceedings such as the 2021-2023 CIP Triennial Plan and planned tariff filings later this fall.

We further note that as part of the resource planning process, there are avenues to request further information regarding the Company's actions in regards to demand response. Further, we will be providing additional benchmarking details and updates toward the impact of demand response as part of Docket No. E-002/CI-17-401 for Performance Based Rates.

¹² *IN THE MATTER OF XCEL ENERGY'S 2017-2019 ELECTRIC AND NATURAL GAS CIP PLAN (DECISION)*. Docket No. E002,G002/CIP-16-115 (November 26, 2019).

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

There are no additional issues or concerns the Company wishes to highlight beyond what is already laid out above.

CONCLUSION

We appreciate the opportunity to provide these Comments. The Company has provided the Commission with a comprehensive plan outlining our goals and plans towards reaching an incremental demand response goal of 400 MW by 2023. As noted in these Comments, we continue to make progress towards this goal as we launch new programs and complete further program development. We respectfully request that the Commission deny AEMA's request for additional process in this Miscellaneous Docket.

Dated: May 27, 2020

Northern States Power Company

CERTIFICATE OF SERVICE

I, Jim Erickson, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States mail at Minneapolis, Minnesota

xx electronic filing

Docket No. E002/M-20-421

Dated this 27th day of May 2020

/s/

Jim Erickson
Regulatory Administrator

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