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June 9, 2020

**Via Electronic Filing**

Mr. Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 Seventh Place East, Suite 350  
St. Paul, MN 55101-2147

**Re: 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**

Dear Mr. Seuffert:

On behalf of the Advanced Energy Management Alliance, please find the Reply Comments attached for filing in connection with the above matter.

Sincerely,

*/s/ Ingrid Bjorklund*

Ingrid Bjorklund  
Attorney for AEMA

Enclosure  
cc: Service List

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

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

**REPLY COMMENTS OF THE ADVANCED ENERGY MANAGEMENT ALLIANCE**

**I. Introduction**

The Advanced Energy Management Alliance ("AEMA")<sup>1</sup> submits this comment in reply to the initial comments submitted by the Department of Commerce (the "Department"), Xcel Energy ("Xcel"), Center for Energy and Environment ("CEE"), and Clean Energy Economy Minnesota ("CEEM") in response to the Minnesota Public Utilities Commission ("Commission") Notice of Comment Period, issued April 24, 2020. AEMA appreciates the constructive opinions by the commenters, which informed AEMA recommendations discussed in this comment.

**II. Background**

AEMA filed its petition requesting that the Commission initiate a miscellaneous docket proceeding to address demand response ordered in Docket No. E002/RP-15-21 on January 11, 2017 ("2017 IRP Order") requiring Xcel to acquire no less than 400 MW of additional demand response by 2023 and adopt a demand response tariff (the "Petition"). Because more than three years have passed, AEMA grew concerned that noncompliance would be more likely than not.

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<sup>1</sup> AEMA is a trade association representing demand response and distributed energy resource aggregators and resource providers including platform companies, technology providers, and end use customers who commit to curtailing their operations when required. The views expressed in this comment are the views of the trade association and not of any one particular member.

Currently, the only public means to monitor Xcel's progress on complying with the 2017 IRP Order is through Xcel's current Integrated Resource Plan ("IRP"), Docket No. E002/RP-19-368. On July 1, 2019, Xcel filed its Demand Response Action Plan in Appendix G1 to its IRP, which stated that its demand response programs will need to be reviewed in forums and approved by the Commission or the Department.<sup>2</sup> The IRP process has stalled until Xcel files supplemental information and modeling as ordered by the Commission on November 12, 2019, which is due on June 30, 2020. As discussed in AEMA's Petition, participation in such a complex docket can be burdensome on stakeholders interested in how Xcel plans to meet its demand response requirement by 2023. Further, additional progress on Xcel's compliance with the 2017 IRP Order was not expected to be included in that supplement.<sup>3</sup>

### **III. Response to Initial Comments**

#### **A. The Department of Commerce**

AEMA supports the Department's recommendation to establish a compliance filing requirement to monitor Xcel's progress to add 400 MW of demand response by 2023. If concerns arise from Xcel's compliance filing, then the Commission can take further action. AEMA does not have specific recommendations on what should be included in a compliance filing other than those proposed by the Department. Due to the enormous scope of Xcel's current IRP docket, AEMA believes an independent docket is necessary track compliance.

AEMA supports the Department's suggestion that the anticipated tariff proceeding before the Commission should consider demand response programs that qualify for the Conservation Improvement Program ("CIP") to ensure programs do not overlap or are made redundant. As

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<sup>2</sup> *In re Xcel Energy's 2020-2034 Upper Midwest Integrated Resource Plan*, MPUC Docket No. E002/RP-19-368, Xcel Initial IRP Filing, Appendix G1—Demand Side Management at 16-17 (July 1, 2019).

<sup>3</sup> *Id.*, Order Suspending Procedural Schedule and Requiring Additional Filings (Nov. 12, 2019).

noted by the Department, Xcel is incentivized to develop programs that qualify for CIP because CIP provides an avenue for cost recovery.<sup>4</sup> Reviewing CIP-qualifying programs is important because, in AEMA’s experience, if programs compete for the same customers, one program could weaken the success of another. For example, if two programs share the same goal (e.g., peak load reduction for a four-hour duration) and both programs are targeting similar customers (e.g., small commercial and industrial customers), then the customer will have to choose between the two programs. These program conflicts can be avoided by defining carefully the service sought along with articulating various service options among different demand response products. This transparency will allow customers to choose which service or services they can provide, therefore, maximizing participation from all customers and maximizing value to the host utility and its ratepayers.

## **B. Xcel Energy**

AEMA is pleased to learn Xcel has launched two new demand response programs approved under CIP and anticipates filing an interruptible tariff as soon as early fall. AEMA is also pleased that Xcel is focusing on “specific programs and markets, such as mid-market customers who traditionally had less participation in demand response programs.”<sup>5</sup> AEMA looks forward to reviewing Xcel’s update to be filed on June 30, 2020, detailing how it plans to add 400 MW of demand response by 2023.

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<sup>4</sup> Department of Commerce, Initial Comments at 8 (May 27, 2020).

<sup>5</sup> Xcel Energy, Initial Comments at 5 (May 27, 2020).

AEMA disagrees with Xcel's characterization of the Commission's requirement as a "goal" as referred to in its comments.<sup>6</sup> The Commission stated in its 2017 IRP Order that "Xcel *shall* acquire no less than 400 MW of additional demand response by 2023."<sup>7</sup>

Xcel highlighted its focus on developing cost-effective demand response programs. AEMA supports this important goal although the 2017 IRP Order does not require this demand response to be cost-effective. As the Commission considers cost-effectiveness of a demand response program, it should note that participation of aggregators in a tariff-based program does not impact the cost-effectiveness analysis. Aggregators work within the specified frameworks detailed in the demand response program and receive compensation by demand response participants for the value they provide. When building a demand response portfolio, an aggregator can include customers who might not otherwise be able to meet all of that program's requirements by pairing those customers with others who can provide complementary requirements. For example, one customer may be able to instantly and remotely curtail demand but do so for only one hour. Another customer may have a longer required lead time to curtail its load but it might be able to curtail for several hours. Absent this portfolio management service, neither customer could participate; however, both customers would be willing to pay an aggregator for its aggregation services to lower their electric bills. These types of aggregation services do not impact the cost-effectiveness. Rather, they allow for increased participation, shield customers from the full breadth of program performance requirements, and provide the utility with a more reliable demand response program.

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<sup>6</sup> *Id.* at 11-14.

<sup>7</sup> *In re Xcel Energy's 2016-2030 Integrated Resource Plan*, MPUC Docket No. E-002/RP-15-21, Order Approving Plan with Modifications and Establishing Requirements for Future Resource Plan Filings at 11 (Jan. 11, 2017) (emphasis added).

Xcel described its stakeholder process and noted that it received feedback on approximately 20 programs or measures.<sup>8</sup> As discussed in AEMA’s Petition, programs were not presented with enough detail to allow feedback from stakeholders beyond an initial reaction. AEMA grew concerned when Xcel presented three interruptible commercial and industrial programs targeting medium and small customers. One program was identified as “Third-Party Aggregation” and described as simply to “allow third-party aggregator to promote, recruit and enroll customers into DR program.”<sup>9</sup> No other details were provided, such as program rules, parameters, payments, and whether aggregation would be allowed in other programs. On its face, AEMA concluded such a program, as described, would compete with other programs targeting similar customers.

AEMA remains hopeful that Xcel is committed to applying the stakeholder’s design principles and filing objectives to its program development. As Xcel develops its products and programs, Xcel stated it is working with customers so they do not bring unknown products to market.<sup>10</sup> AEMA applauds Xcel’s efforts to work with its customers to develop successful demand response programs, but broader input could also help inform such development.

AEMA applauds Xcel’s efforts to develop an interruptible tariff that would allow more flexibility, economic pricing, and buy-through options. According to its Demand Response Action Plan, this program is expected to generate 115 MWs of new demand response and its regulatory path for approval could be a rate case or a miscellaneous filing.<sup>11</sup> AEMA encourages Xcel to file this offering as a miscellaneous filing to facilitate participation among stakeholders who would

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<sup>8</sup> Xcel Energy, Initial Comments at 6.

<sup>9</sup> AEMA Petition, Attachment B at 1 (April 14, 2020).

<sup>10</sup> Xcel Energy, Initial Comments at 6.

<sup>11</sup> *In re Xcel Energy’s 2020-2034 Upper Midwest Integrated Resource Plan*, MPUC Docket No. E002/RP-19-368, Xcel Initial IRP Filing, Appendix G1—Demand Side Management at 17 (July 1, 2019).

not otherwise intervene in its rate case but for this product offering. Additionally, the regulatory process for a miscellaneous docket is typically much shorter than that of a rate case. Even under these circumstances, Xcel would be left with less than two years to fulfill its obligation by 2023.

### **C. Center for Energy and Environment**

After considering comments from the Department and Xcel, CEE urged parties to wait to review Xcel's supplemental filing in its current IRP docket. AEMA concurs with CEE in light of Xcel's commitment to include an update on its demand response plans in this supplement.

### **D. Clean Energy Economy Minnesota**

AEMA appreciates that CEEM supports aggregating demand response to add value to customers, grid operators, and ratepayers. As stated in its Petition, AEMA is interested in allowing aggregators to work directly with utilities to facilitate broader customer participation.<sup>12</sup>

As noted by CEEM, other public service commissions in the Midwest are exploring or encouraging aggregation on the retail level. A recent order issued by the Michigan Public Service Commission ("MPSC") stated that:

[t]he Commission endorses Staff's recommendations to encourage utilities to either develop an ARC-utility collaboration model or present an ARC-utility proposal to expand DR opportunities for their bundled customers in upcoming cases. Such a collaborative approach could assist in identifying additional options for the scaling up of aggregated DR for all customers. . . ."<sup>13</sup>

The MPSC concluded that aggregators could assist utilities in reaching their demand response goals but deferred this collaboration recommendation until it can be combined with other recommendations from staff.<sup>14</sup>

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<sup>12</sup> AEMA Petition at 11.

<sup>13</sup> *In re Commission's Own Motion, to Address Outstanding Issues Regarding Demand Response Aggregation for Alternative Electric Supplier Load*, Michigan Public Service Commission Case No. U-20348, Order at 19 (Aug. 8, 2019). ARC is defined as an aggregator of retail customers and DR is defined as demand response. *Id.* at 1-2. The docket's primary purpose was to address wholesale resources and staff's recommendations; an aggregated retail DR market and framework are still under development.

<sup>14</sup> *Id.* at 20.

#### **IV. An Independent Docket for Compliance is in the Public Interest**

Prior to AEMA filing its Petition, Xcel's current IRP docket had been the only docket where compliance with the 2017 IRP Order could be addressed. Due to numerous delays in that docket, opportunities were not available to nonparties to learn more about Xcel's compliance efforts since its July 1, 2019 filing. It was not practical for stakeholders with a limited interest in a docket with a very broad scope to intervene to issue information requests.

Although Xcel plans to file an update on its demand response plan to comply with the 2017 IRP Order on June 30, 2020 and file its 2021-2023 Triennial Conservation Improvement Plan on July 1, 2020, a dedicated docket would best serve the public. Tracking multiple, complicated dockets can be a burdensome and cumbersome process for stakeholders. Xcel referenced the following five open dockets where details of its efforts to meet the 400 MW requirement have been or will be filed: Integrated Distribution Plan, Conservation Improvement Plan, 2020-2034 IRP, Performance Based Rates docket, and Time-of-Use docket.<sup>15</sup> Additionally, in its Demand Response Action Plan, Xcel stated the regulatory path to approve its interruptible tariff may be through its upcoming rate case, which are typically contested case proceedings.<sup>16</sup> Requiring stakeholders to follow or participate in this long list of dockets to monitor Xcel's progress on its compliance with the Commission's 400 MW demand response requirement creates a major hurdle to transparency and places the burden on stakeholders to employ a hunt-and-peck method to gather information.

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<sup>15</sup> Xcel Energy, Initial Comments at 1, 6, 13.

<sup>16</sup> *In re Xcel Energy's 2020-2034 Upper Midwest Integrated Resource Plan*, MPUC Docket No. E002/RP-19-368, Xcel Initial IRP Filing, Appendix G1—Demand Side Management at 17 (July 1, 2019).



## **V. Recommendations**

AEMA respectfully requests that the Commission require Xcel to file its interruptible tariff as a miscellaneous docket. Further, AEMA requests the Commission to require Xcel to file details of its programs that qualify for cost recovery through CIP for its business customers along with any programs under consideration so stakeholders can evaluate potential concerns when comparing the details of those programs.

AEMA respectfully requests that the Commission dedicate a docket, either a new docket or this docket, to monitor Xcel's compliance toward fulfilling the 400 MW requirement under the Commission's 2017 IRP Order. In an independent docket, stakeholders would have greater access to information and opportunity to raise concerns about potential program offerings.

AEMA respectfully requests that the Commission require Xcel to file its June 30 update to its demand response plan to meet the Commission's 2023 demand response requirement in this docket. Thereafter, the Commission could revisit AEMA's request to initiate a miscellaneous proceeding to direct Xcel to file a demand response tariff for programs that require Commission approval.

Dated: June 9, 2020

Respectfully submitted,

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## **CERTIFICATE OF SERVICE**

I, Ingrid E. Bjorklund, hereby certify that I have this day served a true and correct copy of the following document via electronic filing to all persons indicated on the attached service list:

Reply Comments of the Advanced Energy Management Alliance  
Docket No. E002/M-20-421

Dated this 9<sup>th</sup> day of June, 2020.

/s/ Ingrid Bjorklund  
Ingrid E. Bjorklund

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