

June 9, 2020

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

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

Dear Mr. Seuffert:

Attached are the reply 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 18<sup>th</sup> 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 reply comments in response to the Minnesota Public Utilities Commission's (Commission) April 24, 2020 *Notice of Comment Period*.

The Department **recommends the Commission require Xcel to file a compliance filing on several topics by February 1, 2021 and February 1, 2022**. The Department is available to respond to any questions the Commission may have on this matter.

Sincerely,

/s/ TRICIA DEBLEECKERE  
Planning Director

TD/ja  
Attachment



Before the Minnesota Public Utilities Commission

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Reply Comments of the Minnesota Department of Commerce  
Division of Energy Resources

Docket No. E002/M-20-421

**I. INTRODUCTION AND SUMMARY OF PETITION**

On April 14, 2020, Advanced Energy Management Alliance (AEMA) filed a petition (Petition) requesting that the Minnesota Public Utilities Commission (Commission) initiate a proceeding to expedite and ensure Xcel Energy's (Xcel) implementation of 400 MW of additional demand response by 2023.<sup>1</sup> AEMA requested 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.

On February 20, 2019, the Minnesota Department of Commerce (Department), Center for Energy and Environment (CEE), Clean Energy Economy Minnesota (CEEM), and Xcel filed Comments responding to the Petition.

In its May 27, 2020 Comments the Department withheld making a final recommendation to allow Xcel to respond to AEMA's concerns over Xcel's future non-compliance with the Commission's *Order Approving Plan with Modification and Establishing Requirements for Future Resource Plan Filings* (2017 IRP Order).

**II. DEPARTMENT REPLY COMMENTS**

Xcel noted in its initial comments that it intends to comply with the Commission's 2017 IRP Order and is on track to meet its obligations.<sup>2</sup> Xcel provided an overview of its existing work to date, and an update on its demand response work since the close of the demand response stakeholder meetings in January 2019.<sup>3</sup> As anticipated by the Department, Xcel noted its intention to provide a further update in its June 30, 2020 resource plan supplement.<sup>4</sup>

The Department notes that the demand response product update provided by Xcel included limited details on the future proposals to be filed in the Fall of 2020 (which may be reasonable as they are currently in development). The forthcoming demand response filings were noted to include at least one that will be an interruptible rate program that will include a wider range of response and control

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<sup>1</sup> See AEMA's [Petition to Initiate M-Docket](#), Docket No. E002/M-20-421

<sup>2</sup> Xcel [Initial Comments](#), Docket No. E002/M-20-421, at 1

<sup>3</sup> Id., at 7 – Table 2

<sup>4</sup> Id., at 6 and 11, Docket No. E002/19-368

options, including buy-through offerings and seasonal control (and increased data access for participants).<sup>5</sup>

Xcel further provided insight into the connection of its demand response development activities to other dockets before the Commission that are enabling additional demand response offerings or tracking this issue; notably Advanced Metering Infrastructure (AMI) and Performance Incentive Metrics.<sup>6</sup> Xcel noted the 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.”<sup>7</sup>

Due to the various on-going dockets relating to demand response and forthcoming IRP and CIP filings, Xcel’s indication that it intends to comply with the Commission’s 2017 IRP Order, and the plan to comply included in Xcel’s Initial Comments, the Department continues to conclude that a new miscellaneous docket on this matter is not necessary at this time.

However, in order to allow for an update on the status of Xcel’s demand response product offerings and compliance with the 2017 IRP Order, the Department recommends the Commission require Xcel to file a compliance filing on February 1, 2021 and February 1, 2022. The February 1 compliance filing date is appropriate as it would be following Xcel’s June 30, 2020 Integrated Resource Plan Supplement, the Conservation Improvement Plan Triennial Filing on July 1, 2020, and the filing of any anticipated demand response products noted to be forthcoming in the Fall of 2020. If there were delays in any of the anticipated demand response products to be filed in the Fall of 2020, this update would provide an avenue for the Commission and stakeholders to be notified of such. The compliance updates should include the information outlined in the Department’s initial Comments:

1. status of stakeholder meetings (if any)
2. list of expected product offerings
3. status of product offering development
4. date, or estimated date, of regulatory filings
5. implementation status
6. subscription level status and forecasts
7. time-of-use and critical peak pricing product status or learnings from Advanced Metering Infrastructure pilots

In initial comments, the Department did not indicate a preference for the location of the filing, whether in the resource plan docket (E002/RP-19-368), this instant docket (E002/M-20-421), or a new docket. After review of this record, this docket’s Service List, and the Great Plains Institute (GPI) stakeholder summary, the Department recommends that the updates be provided both in the resource plan docket and this instant docket. The stakeholder list for the GPI workshops include multiple stakeholders that may not track Xcel’s resource plan’s voluminous record. A concurrent filing in this

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<sup>5</sup> Id., at 9

<sup>6</sup> Id., at 6, Docket Nos. E002/M-19-666 and E002/M-17-401

<sup>7</sup> Id., at 11

docket would reach entities that have self-selected as interested in Xcel-related demand response topics by subscribing or registering for this instant docket's service list.<sup>8</sup>

- MISO
- Advanced Energy Management Alliance
- Center for Energy and Environment
- Citizens Utility Board of Minnesota
- Fresh Energy
- Great River Energy
- Landis+Gyr
- LLS Resources, LLC
- Minnesota Department of Commerce
- Minnesota Municipal Utilities Association
- Minnesota Pollution Control Agency
- Minnesota Power
- Minnesota Public Utilities Commission
- MN Attorney General's Office
- MN Department of Commerce
- MN Pollution Control Agency
- NRG Curtailment Solutions, Inc.
- Otter Tail Power Company
- Rakon Energy LLC
- Stoel Rives, on behalf of the Xcel Large Industrials
- Strategen Consulting
- The Brattle Group
- The Mendota Group, LLC

Last, the Department intends the compliance filings to be filings only; it is not intended to require approval or action by the Commission unless a stakeholder or Commission staff raise concerns with the compliance filing content.

### III. DEPARTMENT RECOMMENDATIONS

The Department recommends that the Commission require Xcel to file a compliance filing on their demand response offerings on February 1, 2021 and February 1, 2022 to be filed in Docket No. E002/RP-19-368 and Docket No. E002/M-20-421. The compliance filing should include:

8. status of stakeholder meetings (if any)
9. list of expected product offerings
10. status of product offering development
11. date, or estimated date, of regulatory filings
12. implementation status
13. subscription level status and forecasts
14. time-of-use and critical peak pricing product status or learnings from Advanced Metering Infrastructure pilots

/ja

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<sup>8</sup> AEMA Petition, Attachment A at 9

## **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**  
**Reply Comments**

**Docket No. E002/M-20-421**

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

**/s/Sharon Ferguson**

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