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June 9, 2020

—Via Electronic Filing—

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

RE: REPLY 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 Reply Comments in response to Comments received from parties on May 27, 2020 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

REPLY COMMENTS

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission these Reply Comments in response to Comments received from parties on May 27, 2020 and in accordance with the Commission's April 24, 2020 Notice of Comment Period regarding the Advanced Energy Management Alliance's (AEMA) April 14, 2020 Petition.

We appreciate the Comments of the Minnesota Department of Commerce (Department) and Center for Energy and Environment, both of which noted Xcel Energy's commitment to demand response and concluded there was no reason we could not reasonably meet our demand response obligations. We also appreciate the interest in our demand response programs laid out in the Comments of Clean Energy Economy Minnesota (CEEM), though we disagree with its ultimate recommendation.

To date, we have taken appropriate steps to add incremental demand response resource by 2023. We have done so through a measured approach, in order to hear from stakeholders, incorporate their feedback, and take time to identify the right opportunities as new technologies have come to market and the Company's plans for modernized meters have crystalized. Our demand response portfolio has increased by 73 Gen. MW to date, and we anticipate that our newly launched programs will see an uptick in participation through 2021 once the impacts of today's economy are normalized.

Based on our ongoing work towards procuring 400 MW of demand response by 2023,

and for the reasons laid out in our Initial Comments, we oppose opening a Miscellaneous Docket specific to the 400 MW of Demand Response. A new docket, in addition to those already existing today, is unnecessary and could unintentionally complicate and compromise our plans to add the demand response outlined in our IRP filings. We are in alignment with both the Department and Center for Energy and Environment, that the Company continues to build the record in this matter and there is no indication at this time of noncompliance. In these Reply Comments, we briefly restate our opposition to AEMA's proposal and respond to CEEM's comments.

REPLY COMMENTS

I. GROWTH OF DEMAND RESPONSE

As discussed in our Initial Comments, we anticipate meeting the 400 MW demand response target established in the Commission's January 11, 2017 Order. We have outlined a five-year action plan in our *2020-2034 Upper Midwest Resource Plan* (2020-2034 IRP) and provided additional detail regarding our development plans and products that we believe will help us achieve these goals. Observers of this data can take the following away from these details:

- Increased demand response is generally forecasted between 2020 and 2022;
- COVID-19 impacts will likely move this forecast to 2021 thru 2023;
- We focused on thirteen products and, where barriers were discovered (from policy concerns, technology availability/cost, or customer interest), we took a measured approach towards testing measures or piloting in areas where these barriers were minimized;
- Four programs recently have been launched (including Smart Thermostats and Optimization in South Dakota and Wisconsin);
- Some products are technology dependent; and
- By providing a wide array of offerings – each aimed at particular customer needs – we are able to meet customers where they are.

We are taking responsible action towards achieving 400 MW of additional demand response through the steps laid out in various filings. Our comprehensive plan outlines our goals and plans towards reaching 400 MW and we continue to make progress towards this goal as we launch new programs and complete further product development.

II. DEPARTMENT OF COMMERCE

In their Comments, the Department asks that the Company complete a compliance filing every February to include: Status of stakeholder meetings (if any); List of expected product offerings; Status of product offering development; Date, or estimated date, of regulatory filing; Implementation status; Subscription level status and forecasts; and Time-of-use and critical peak pricing product status or learnings from Advanced Metering Infrastructure pilots.

We note that we already file many of these details in other active dockets, including dockets related to Performance Based Rates (Docket No. E002/CI-17-401), our Integrated Distribution Plan, and CIP proceedings. If, however, the Commission would prefer we file the requested information somewhere else, we would not oppose this request.

III. CLEAN ENERGY ECONOMY MN

CEEM is the only commenter to support AEMA's petition. We briefly address their Comments below.

A. Stakeholder Feedback

CEEM offers their concern regarding stakeholder feedback and the ability to engage in sufficient discussion to ensure programs meet stakeholder needs. We appreciate CEEM's concerns here, but also note that stakeholders involved in our Stakeholder process from 2017 to 2019, indicated their reluctance to provide full support towards specific program details until such time as those products and opportunities were filed within a docketed process for review. At the completion of our Stakeholder discussions, we committed to filing answers to the specific stated goals as part of any filing to the Commission. We maintain that commitment and will provide those details as part our filings for specific programs.

B. Further Policy Goals

CEEM notes the Commission's 2019 Order in Docket No. E002/CI-17-401, regarding several demand response metrics. CEEM argues that a miscellaneous docket could further hone potential policy issues for future policy concerns related to demand response compliance and performance metrics. We believe these details are already addressed by the active Performance Based Metrics docket and should not be duplicated here. In fact, in Docket No. E002/CI-17-401 the Commission's April 16,

2020 Order (at Order Point 1(f)) address these policy issues, and the Company will address them when it consults with the Department and interested stakeholders and subsequently files a demand response financial incentive in the first quarter of 2021.

C. Aggregation

In addition to the requested details in the Commission's Notice, CEEM provides additional detail regarding aggregation. As an initial matter, we note that in a May 18, 2010 Order in Docket No. E-999/CI-09-1449, the Commission considered the value of services provided by aggregators. In that Order, the Commission summarized these services as follows:

The non-utility aggregators, called ARCs (Aggregators of Retail Customers), would pay utility customers to reduce their usage - e.g., by turning off machinery, appliances, manufacturing processes - during periods of high demand. The ARCs would make a profit by selling these usage reductions into the wholesale energy market as a substitute for additional generation when generation prices are highest.

Recognizing that, "for decades," Minnesota has had "a long history of effective demand side management," and that it was "important not to jeopardize these gains or to jeopardize utilities' ability to build on these gains," the Commission "prohibit[ed] ARC operations" at that time. AEMA's Petition is consistent with this Order and specifically requests that the Commission not consider this Miscellaneous Docket as a request to open the Commission's 2010 Order with respect to FERC Order 719. In fact, AEMA's interests are working with the utility under already established rules.

Notwithstanding this Order, as we look to continue our successful demand side management programs, we have periodically reviewed the value of aggregation services. In determining this value, most utilities utilize market pricing rather than direct incentives or discounts to customers. Based on our review of MISO pricing for the Company's NSP service area, we have found the prices for these resources to be too low to support cost-effective demand response programs.

Along with market pricing, we continuously evaluate the avoided cost for our demand response resources. Because the Company manages the demand response portfolio, nearly all of the program incentive can be offered to customers today via financial incentives, after administrative costs are covered. The addition of an aggregator would either introduce new administrative costs to the portfolio, reduce the amount of incentives available to customers, or both, for the aggregator to make profit. In other

words, acquiring capacity through a third-party aggregator in these circumstances would increase the cost to the Company and thus our customers, and would also likely reduce the incentive paid directly to participating customers, compared to our existing delivered programs.

This may be an acceptable approach for utilities without a robust portfolio, particularly those looking to launch a new portfolio and grow quickly. However, for an established demand response portfolio like Xcel Energy's, the incremental value achieved by contracting with an aggregator is minimal, potentially outweighed by the additional costs and administrative burdens. The cost of aggregation services plus the cost of incentives or discounts sufficient to motivate customers to participate in demand response programs continues to be a barrier to aggregation solutions.

We conducted a request for proposal (RFP) in 2019 for "Demand Response Services" to support its demand response portfolio in Xcel Energy's Colorado service territory. This RFP did not solicit a traditional aggregator model, but instead a partner to help promote and enroll new customers into the portfolio via a pay-for-performance agreement. Specifically, this partner will target non-managed commercial customers that are not actively engaged with our Account Management or Business Solutions Teams. We have awarded this work, but the launch has been delayed due to the COVID-19 pandemic. However, we still learned, through our review of RFP responses, how the scale of administrative costs from third-party support can negatively impact the portfolio's cost effectiveness and limit the incentives available to customers. We will evaluate this partnership model in Colorado to see if it can efficiently grow the portfolio while maintaining cost effectiveness. Currently, however, we do not believe introducing third-party support or aggregation services in Minnesota is necessary or in the public interest.

CONCLUSION

We appreciate the opportunity to provide these Reply Comments. The Company respectfully requests the Commission deny AEMA's request for a new Miscellaneous Filing based on our active planning and continued development for demand response identified in this docket and as part of the IRP process.

Dated: June 9, 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 9th day of June 2020

/s/

Jim Erickson
Regulatory Administrator

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