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June 11, 2021

—Via Electronic Filing—

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

RE: SUPPLEMENTAL REPLY COMMENTS
REQUEST FOR APPROVAL OF AGIS INITIATIVE RELATED TARIFF CHANGES
AND A VARIANCE TO COMMISSION RULES
DOCKET NO. E002/M-20-592

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission the enclosed Supplemental Reply Comments in response to Comments received from the Department of Commerce – Division of Energy Resources on May 28, 2021.

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 Amber Hedlund at amber.r.hedlund@xcelenergy.com or (612) 337-2268 or me at bria.e.shea@xcelenergy.com or (612) 330-6064 if you have any questions regarding this filing.

Sincerely,

/s/

BRIA SHEA
DIRECTOR, REGULATORY & STRATEGIC ANALYSIS

Enclosure
c: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

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Joseph K. Sullivan
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Chair
Commissioner
Commissioner
Commissioner
Commissioner

IN THE MATTER OF THE PETITION OF
NORTHERN STATES POWER COMPANY
REQUESTING APPROVAL OF AGIS
INITIATIVE RELATED TARIFF CHANGES
AND A VARIANCE TO COMMISSION RULES

DOCKET No. E002/M-20-592

**SUPPLEMENTAL REPLY
COMMENTS**

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission these Supplemental Reply Comments in response to Supplemental Comments received from the Department of Commerce – Division of Energy Resources on May 28, 2021.

In July 2020, the Company requested approval of two Advanced Metering Infrastructure (AMI) implementation-related matters: (1) an AMI opt-out framework that would provide customers the option to choose cost-based manual meter reading in lieu of having their energy usage collected via an AMI meter, and (2) a variance from Minn. R. 7820.3500, which governs the content of utility bills, so that customer bills reflect that they are based on intervals of energy usage, rather than the present timeframe-based usage calculated using the previous and current meter readings. We submitted these requests in July 2020 – approximately 18 months in advance of our planned AMI deployment to allow sufficient time for the Commission to consider our requests.

The Department submitted initial Comments on the Company's proposals on September 9, 2020. In their Comments, the Department posed several questions to the Company and noted they would submit supplemental comments with a recommendation after the Company's Reply. We submitted our Reply Comments on September 23, 2020. The Department submitted their Supplemental Comments May 28, 2021 –recommending that the Commission approve the Company's proposals,

with modifications. We appreciate the Department's acknowledgement of the time that has elapsed and recognition that further procedural delays may affect our current AMI implementation timeline. With that said, we generally accept the Department's recommendations, with one clarification. We also note that we have confirmed with the Department that our understanding of these Recommendations is consistent with their intent.

Specifically, we want to clarify our understanding of Department Recommendation No. 8 and the cost recovery portion of Recommendation No. 6, as follows:

The Department recommends that the Commission require Xcel to file estimated and actual revenue information (information included in Information Request Nos. 6, 7, 9, 10, 13, and 14) in any upcoming cost-recovery requests for AMI and FAN. (Department Recommendation 8)

The Department recommends that the Commission require Xcel to file within 30 days of the Commission's decision on this tariff an update on the selected Manual Meter Read Meter and updated cost estimates and Tariff Sheets in the instant proceeding **and in any future cost recovery request that reflects the final cost differential of the non-standard meter.** (Department Recommendation 6) [Emphasis added]

As we explained in our Petition and in our response to Department Information Request No. 10, the MMR service tariff is wholly separate and incremental to base rates and any future overall AMI cost recovery. We believe at least some of the information that the Department seeks with Recommendation No. 8 may be included in the compliance filings noted in Recommendation No. 6 (the 30-day compliance filing) and No. 7 (a formal review within one year of full AMI implementation) – and would only be included in a future cost recovery request *if the cost components of the MMR service are implicated*. For example, the MMR service calculation deducts the meter reading cost embedded in base rates, to avoid double-charging opt-out customers. To the extent that cost materially changes in our next rate case, the MMR service calculation should be reviewed for potential update upon implementation of final rates. The other major component of the MMR service is the incremental cost of a non-standard meter in relation to a standard AMI meter. If the cost of the standard AMI meter in the Company's future request for recovery of AMI costs through the TCR Rider changes, the MMR service tariff may require update. However, if the standard AMI meter cost remains the same as what is built into the MMR service, then no update is necessary. If no update to the MMR service is implicated, the Company will state such in its cost recovery filing. With this clarification, we accept Department Recommendation Nos. 6 and 8.

We discuss our response to the Department's recommendations in more detail below.

A. AMI Opt-Out Framework

The Department categorized its assessment of the Company's proposed AMI opt-out framework as follows: (1) how the opt-out option will be communicated to customers, (2) the reasonableness of the proposed opt-out charges, (3) the proposed tariff sheets.

1. Opt-Out Customer Communication and Education

We accept the Department's recommendations to include specific aspects of our AMI plans in our Communication Plan and materials. We also agree to work with the Commission's Consumer Affairs Office (CAO) on our final plan and materials regarding opt-out of AMI.

a. Specific Topics/Content

The Department recommended the Company's AMI Implementation Communication Plan specifically address the below aspects of a customer's decision to potentially opt-out of an AMI meter:

- Scope of AMI-DI, including projected Day 1 uses and future capabilities (e.g. Field Area Network, Home Area Network, Green Button Connect My Data)
- Xcel Energy customer data access, frequency, access by utility
- Customer Energy Usage Data access and rights
- Information on Customer Data Disaggregation

We confirm that our Communication Plan will address each of these topics. We, however, clarify that the Plan itself will not contain all of the details for these subjects; rather the Plan will note that communication to customers will include information about these topics either in communications sent to customers or on the company's website.

We also clarify that the materials we send to customers as part of our 90-60-30 day pre-implementation communications plan will provide more general information, and will include helpful links to where customers can find more information online or from one of our customer service representatives. For example, we will inform customers that they have the option to opt-out of having an AMI meter installed, and that choice will have a cost and potentially other implications in terms of the data and programs that they will be able to participate in. They will be able to get further details about the implications on our website, or by contacting our customer care center.

For example, in addition to being notified of the fees associated with opting out, our communications will explain that opting out of an AMI meter means they will have limited access, and they only see monthly updates to their interval energy usage data within the web portal, rather than daily updates. We will also explain that customers who opt out will not have the capability to access real-time energy information and insights, including HAN connectivity when it becomes available, which can allow for real-time disaggregation of energy consumption by appliance, high usage-related alerts and notifications, and other real-time safety and security services. Customers who opt out will also have limited access to energy and bill management tools compared to customers with AMI meters, due to the monthly collection of their usage data.

b. Working with the CAO Will Provide a Robust and Complete Review

The Department recommends that the Company work with the CAO to finalize its Communication Plan – noting that the Commission and Company have taken this approach in the past. Specifically, the Company worked with the CAO on our customer communication materials associated with our Time of Use Rate Pilot. We also regularly work with the CAO on other customer communications, including the Company’s annual data privacy notice to customers and various bill messages throughout the year. The CAO provides helpful perspective due to their public-facing role with the Commission, and it is an established process that will provide a robust review in the most expedient manner, which is important to keep our AMI implementation on track.

In an effort to keep our AMI implementation on track for Q1 2022, we intend to initiate review of our Communications Plan and key meter installation and opt-out materials with the CAO by the end of June 2021. This is in an effort to keep our implementation timeline on track as much as possible. For example, our implementation timeline calls for development of our internal training materials to begin July 1, 2021 and training to start September 15, 2021. With a January 2022 AMI implementation start, we will start sending out customer communications October 1, 2021. These steps all require the Company to know the outcome of this proceeding.

In Supplemental Comments, the Department also outlines alternatives to its recommendation that the Company work with the CAO toward gathering further feedback on the Company’s Communication Plan. Stakeholders have had an opportunity to provide input through the procedural process and through Technical Workshops. In Supplemental Comments, the Department noted the Company’s stated intent to hold such Workshops in our August 28, 2020 Procedural Paths

Compliance Filing in Docket No. E002/M-20-680. To that end, we participated in a Workshop held by the Department in October 2020, held a second workshop in November 2020 – and afterward, sought feedback from stakeholders on further areas of interest for potential further Technical Workshops.

Specifically, the Department hosted the first stakeholder workshop on October 23, 2020, and the Company presented on the following topics, as specified by the Department:

- AMI selection/process overview
- Selected AMI technology
- FAN selection process and technology
- AMI and FAN financials and cost-benefit analysis
- Customer strategy and roadmap
- Customer data availability and access requirements & rights

Due to the interest in the customer strategy and products and services roadmap at the October 23rd workshop, we held a second workshop on November 20, 2020 that was squarely focused on our planned advanced grid customer engagement, communications, and our products and services roadmap. We had significant dedicated time for questions and discussion in the workshop and additionally issued a survey after the workshop to provide another forum for feedback and questions. We send the survey to over 150 interested parties and received only nine responses, most of which either asked for future workshops on topics we already covered, or non-related topics, such as microgrids, solar inverters and energy storage, and the Company's plans for its non-wires alternatives analysis.

We believe no further workshops are needed on the Company's Communication Plan. Conducting stakeholder workshops is time and resource intensive and trying to do so at this point is not practicable and may serve to delay the start of our AMI implementation. Similarly, the Company submitting its Communication Plan subject to a Notice of Comment period is not practicable at this point and may also serve to delay the start of our AMI implementation.

We therefore respectfully request the Commission accept the Department's recommendation that the Commission delegate approval to the Executive Secretary to approve our Communications Plan and opt-out materials after consultation with the Commission's CAO, and require the Company to submit the Plan and opt-out materials in a compliance filing in this and other related dockets (Docket Nos. E002/M-20-592, E002/M-19-666 and E002/M-20-680).

2. *Proposed Charges for Manual Meter Reading*

In Supplemental Comments, the Department recommends the Company make two compliance filings regarding the charges and revenues associated with this service: (1) within 30 days of the Commission's Order in this proceeding, and (2) within one year of full AMI deployment. As such, the Company accepts Department Recommendation Nos. 6 and 7. With respect to Department Recommendation No. 8 and the future cost recovery request aspect of Recommendation No. 6, as discussed above, we are happy to include that information in these compliance filings to the extent it is relevant. As we also clarified above, we are also happy to include the information if it is relevant to a future cost recovery request that implicates part of the MMR service charge components (i.e., incremental cost of a non-standard meter or the adjustment for meter reading costs embedded in base rates).

3. *Tariff Sheets*

The Department noted its review of the Company's proposed MMR Service Rider tariff sheet, Section No. 5, Original Sheet No. 148 and concludes that the language (as amended by the Company's Reply Comments) is reasonable.

B. Billing Content Rule Variance

In recommending that the Commission grant the Company's variance request, the Department recommended the approval should be conditioned upon the Company indicating the frequency of interval reading on customers' bills.

We agree this is a good addition to customers' bills and will plan to indicate the billing interval in the Total Energy line item as indicated in Figure 1 below. (Note, the Department suggested we include the billing interval in the "Usage Type" box which we are not able to do because that field informs the customer whether the usage is from an *actual* reading of the meter or an *estimate* of usage. However, we believe our proposed bill addition is consistent with the Department's intent).

Figure 1: Sample Bill Excerpt Showing Proposed Location for Billing Interval Information

SERVICE ADDRESS:	STREET ADDRESS CITY ST ZIP CODE
NEXT READ DATE:	06/15/21
ELECTRICITY SERVICE DETAILS	
PREMISES NUMBER:	300000000
INVOICE NUMBER:	0900000000

METER READING INFORMATION		
METER 1234567		Read Dates: 04/05/20- 05/04/20 (29 Days)
DESCRIPTION	USAGE TYPE	USAGE
Total Energy	15 Min Intervals	Actual
		771 kWh

We also note that our Communication Plan contemplates informing customers that their bills will look different. Like we explain above for AMI opt-out, the billing-related communications will work similarly, where during the 90-60-30 day pre-install communications process, we will point customers to resources where they can learn more – either on our website, or through our customer service representatives. With respect to how their bills will look after they have an AMI meter, the more detailed resources will explain that residential customer billing will be based on a 15-minute usage interval. Customers will also be able to see their respective billing usage intervals in the web portal, along with their usage and billing details.

Finally, the Department noted its review of our proposed tariff sheets under Section No. 8, Customer Billing Forms and Notices and concluded that the proposed revisions are reasonable – recommending the Commission approve the modification to the proposed standard customer interval bill, subject to the Company indicating the billing interval on the billing form. If the Commission approves our requested variance to Minn. R. 7820.3500, subp. A, we will submit revised tariff sheets that include the billing interval indicator as shown in Figure 1 above within 30 days of the Commission’s Order in this proceeding.

C. AMI Cost Recovery

The Department additionally notes in Supplemental Comments that if the Company files its AMI proposal in its forthcoming TCR rider as expected, we should explicitly delineate costs and exclude its AMI proposal cost recovery request from our next rate case to avoid any potential for double recovery. We confirm that our intent is to reflect the costs in either the Rider or base rates, but not both.

CONCLUSION

We respectfully request the Commission to approve our Manual Meter Reading Service Tariff and Bill Content Rule Variance requests as supplemented by these Reply Comments.

Dated: June 11, 2020

Northern States Power Company

CERTIFICATE OF SERVICE

I, Mustafa Adam, 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-20-592

Dated this 11th day of June 2021

/s/

Mustafa Adam
Regulatory Administrator

[illegible]

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