

May 10, 2021

William Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7th Place East, Suite 350  
Saint Paul, MN 55101

RE: Docket No. 20-812

Dear Mr. Seuffert:

The City of Minneapolis offers reply comments on Xcel Energy's most Hosting Capacity Analysis (HCA) Report and appreciates the Company's preparation of this most recent HCA. Minneapolis adopted the State of Minnesota statutory climate goals<sup>1</sup> as part of our 2013 Climate Action Plan.<sup>2</sup> Meeting the goals of the plan requires a combination of electrification and deploying renewable energy. In addition to siting distributed solar, an HCA for new load could support an understanding of the best locations for placing new EV chargers and targeting building electrification activities. New electricity loads will include:

- Electric Vehicles (EVs): Minneapolis has **2,761 EVs and PHEVs** of the 18,749 registered statewide. The number of EVs in Minneapolis doubled since April 2019.<sup>3</sup> Minneapolis has a goal to electrify its municipal vehicle fleet this decade and supports statewide transportation electrification policies, including the newly approved Clean Cars Minnesota rule.<sup>4</sup>
- Building electrification: Minneapolis greenhouse gas emissions profile shows that emissions from fossil gas is increasing while emissions from electricity is decreasing. The City will not meet its climate goals without electrifying buildings, which includes new heating loads.

**Minneapolis requests that the Commission require Xcel Energy to perform an HCA for new loads similar to the way it does for siting solar today.**

**The Commission should ensure that Xcel provides a usable tool by requiring the detailed criteria violation results to be provided both in the online map and downloadable spreadsheet.**

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<sup>1</sup> Next Generation Energy Act of 2007.

<sup>2</sup> 2013 Minneapolis Climate Action Plan.

<sup>3</sup> Minnesota Pollution Control Agency. [MN EV Dashboard](https://www.pca.state.mn.us/air/clean-cars-mn-why). March 17, 2021.

<sup>4</sup> <https://www.pca.state.mn.us/air/clean-cars-mn-why>

- Without the ability to correlate the data in the criteria violations spreadsheet with a location on the map, the data in the spreadsheet is not useful to the city and other customers.
- What's the point in providing the data if it can't be associated with a location where it can be used?

Monthly updates are necessary so that the HCA is up to date when customers need it. Based on the record, Minneapolis emphasizes the public benefit to Minnesotans of having an up to date HCA to support state and local policy goals, economic development, and consumer choice as part of ongoing grid modernization efforts. **The Commission should establish a firm date by which Xcel must begin updating its HCA on a monthly basis.**

**The Commission should not decide about the frequency of HCA updates relying exclusively on Xcel's representation of the time and cost needed for a field verification program.** Minneapolis notes that information requests from the PUC Staff and Interstate Renewable Energy Council's (IREC) comments pointed out that certain aspects of Xcel's field verification program were already being implemented or unnecessary for an HCA of the primary system. IREC also observed that other utilities that employ a monthly HCA update cycle without the time or cost of an extensive field verification program.

Xcel is an asset management company at its core, and like other large companies with valuable assets, from government agencies to banking and mobility to food service, and any other major industry, it should invest in an asset management system for tracking its equipment. Data tracked could include information such as the equipment type, date in service, capacity, and other critical information. If the Company does not have an adequate asset management system and therefore lacks accurate information about its system for the kinds of energy services that are common today, field verification should be completed, not just for the HCA, but for other end uses. The HCA is just one example of how this information can be applied for productive purposes. Therefore, if Xcel implements a field verification program, its costs should be recovered from all customers, not just those with distributed energy resources.

**Minneapolis also supports Institute for Local Self Reliance and IREC's request that Commission staff facilitate a working group where stakeholders can present their own proposals for integrating the HCA into the interconnection process.**

The City of Minneapolis appreciates the opportunity to offer input into the Commission's investigation. Thank you for your consideration of these comments.

Sincerely,



Mr. Kim W. Havey, LEED AP, AICP

Division of Sustainability

STATE OF MINNESOTA )

) ss. **CERTIFICATE OF SERVICE**

COUNTY OF HENNEPIN )

I, Stacy A. Miller, of the City of Minneapolis, County of Hennepin, State of Minnesota, affirm that on the 10th day of May 2021, I served a copy of the following via e-mail and/or via U.S. Mail:

**REPLY COMMENTS of the City of Minneapolis regarding Docket No. 20—812**

at the last known mailing addresses and email addresses of said entities/individuals on the attached Service List. If by U.S. Mail, I placed said document in postage prepaid envelope and placed same in the U.S. Post Office in Minneapolis, Minnesota for delivery by the United States Postal Service.



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Stacy A. Miller

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