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June 4, 2021

—Via Electronic Filing—

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

RE: SUPPLEMENT TO REPLY COMMENTS
DISTRIBUTION SYSTEM – HOSTING CAPACITY ANALYSIS REPORT
DOCKET NO. E002/M-20-812

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy submits this Supplement to its May 21, 2021 Reply Comments to address a question the Department had asked the Company in Comments, but was inadvertently not included in our Reply Comments.

While our Reply Comments provided estimated efficiency improvements associated with the HCA integrations and automations we outlined for two alternative paths to the Commission's long-term goal for the HCA, the Department had asked the Company to more specifically respond to the time savings we noted in our initial HCA Report. In our initial HCA Report, we estimated that as with the foundational asset data initiative combined with the HCA automations and integrations, we could save nearly 1,000 hours of engineering time per year (based on 300 Supplemental Screens per year). Our Reply Comments conveyed the efficiency gains in percentages in relation to our current average hands-on processing times, but we did not tie those to the screening volumes or specific processing time improvements.

We clarify that these efficiencies would *not* be realized through staff reductions. Rather, with the current and expected continued trend of increasing interconnection applications, we will need to add staff. These efficiencies would be realized through an increased ability to process applications more expeditiously and timely in the near-term and long-term, perhaps reducing *future* staffing levels due to the more efficient

processes and tools. We summarize the estimated engineering efficiencies in Table 1 below.

Table 1: Annual Application Screening Volumes and Estimated Engineering Efficiencies – Based on Approximate 2020 Volumes

Roadmap Option	Initial Review Screen			Supplemental Review Screen		
	Average Processing Time	Estimated Annual Avg Engineering Hours	Estimated % Efficiency Gain	Average Processing Time	Estimated Annual Avg Engineering Hours	Estimated % Efficiency Gain
Current Process As-Is	0.5 – 1.5	813-2,438	N/A	3 – 4	900-1,200	N/A
Path 1 (Full Data Validation and Automation)	0.25 – 0.5	406-813	50-75%	1 - 2	300-600	50-75%
Path 2 (No Data Validation and Partial Automation)	0.5 – 1.5	813-2,438	<i>Measurable gain not expected</i>	2 - 3	600-900	25-50%

Assumptions:

- *Initial Review Screen* only requires validated customer secondary transformer size and amount of DER existing on secondary transformer. Today, the most significant difficulty is validating which transformer a customer is on, its size, and the amount of Distributed Energy Resources (DER) present. The assumption in the estimated efficiency gains is that a full Secondary System validation would provide enough confidence to allow near full trust in existing data, and automation would allow automatic lookup of data. Lack of foundational system data validation forces continued engineering/manual confirmation of data on a per application basis. Approximate 2020 volume 1,625.
- *Supplemental Review Screen* requires both Primary and Secondary System data validation for full functionality/to fully realize the estimated efficiencies. The current process involves a spreadsheet voltage analysis, which frequently requires engineering quality assurance checks using our Synergi system. A full foundational System data validation allows for full trust in the Synergi model, and the Synergi model library/automation would allow us to completely remove the spreadsheet analysis from the process. Further automation could be achieved leveraging Synergi’s built-in screening process with DNV (Synergi vendor) assistance. The Path 2 alternative may still allow the removal of the spreadsheet voltage analysis, but additional engineering scrutiny will be required compared to Path 1, reducing the estimated efficiencies accordingly. Approximate 2020 volume 300.

The tie between these estimated efficiencies and our original statement that we could save “nearly 1,000 hours” of engineering time per year is Path 1 for the Supplemental Review Screens. As shown in Table 1 above, the estimated average annual engineering hours are reduced by 600-900 hours (i.e., from 900-1,200 hours in the current process to 300-600 hours per year).

The Department also asked the Company to identify any further savings that may

result from using the HCA in the Supplemental Review Screens of the MN DIP, including savings experienced by developers. Developers have been clear in the hosting capacity and other related proceedings that processing time for their applications is essential to their processes. We are not able to quantify that in terms of tangible savings.

We apologize for inadvertently leaving out this more robust and responsive description of these estimated savings in our Reply Comments, and respectfully request the Commission to accept this additional information into the record for this proceeding.

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 all parties on the attached service list. Please contact Jody Londo at jody.l.londo@xcelenergy.com or me at bria.e.shea@xcelenergy.com if you have any questions regarding this filing.

Sincerely,

/s/

BRIA E. SHEA
DIRECTOR, REGULATORY & STRATEGIC ANALYSIS

c: Service List

CERTIFICATE OF SERVICE

I, Lynnette Sweet, 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-20-812

Dated this 4th day of June 2021

/s/

Lynnette Sweet
Regulatory Administrator

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