

KEYES, FOX & WIEDMAN^{LLP}

February 22, 2016

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2147

VIA ELECTRONIC SERVICE

*Re: In the Matter of Xcel Energy's 2015 Biennial Distribution Grid Modernization Report
PUC Docket No.: E-002/GR-15-962*

Dear Mr. Wolf,

The Energy Freedom Coalition of America ("EFCA") hereby submits its Reply Comments to the Minnesota Public Utilities Commission ("Commission") in the above-entitled matter.

EFCA has electronically filed this document with the Commission and is serving a copy on all persons on the official service list for this docket. A Certificate of Service is also enclosed.

If you have any questions regarding this filing, please contact me at 970-531-2525 or at jschlesinger@kfwlaw.com.

Sincerely,

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Enclosure

Cc: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

IN THE MATTER OF XCEL ENERGY'S
2015 BIENNIAL DISTRIBUTION
GRID MODERNIZATION REPORT

DOCKET No. E002/M-15-962

**REPLY COMMENTS OF THE
ENERGY FREEDOM
COALITION OF AMERICA**

The Energy Freedom Coalition of America (“EFCA”)¹ hereby submits its Reply Comments pursuant to the State of Minnesota Public Utilities Commission’s (“Commission”) Notice of Comment Period (“Notice”), issued November 17, 2015 and extended on January 22, 2016. EFCA notes that the parties to this proceeding raise many similar concerns, although their solutions differ in some places. EFCA looks forward to participating in this proceeding and appreciates the Commission’s request for comments.

1. Introduction and Summary

EFCA is pleased to find several key areas of agreement among the parties that govern their more detailed responses. First, parties without exception recognize that the point of this effort is to modernize Minnesota’s electric grid, and that this effort has multiple dimensions—including those that were mentioned in the statute, as well as the broader concepts under discussion in the grid modernization proceeding (15-556).² Second, parties agree that the statutory changes related to grid modernization provide Northern States Power Company (“Xcel”) with the option for special cost recovery, and with that option comes the ability of stakeholders to have greater insight and say into distribution planning and grid modernization.³ Third, many parties agree that part of the process related to certification of grid modernization projects should include a thorough examination and analysis of alternatives. Fourth, several parties have noted that utilities seeking to certify projects should provide more information in future biennial reports.

As technologies develop and customers are faced with more and more alternatives in energy supply and conservation measures, it will be important for the Commission to ensure that utilities do not use their monopoly power to manipulate or restrict competitive industries. Competition both puts downward pressure on costs, and creates more choices and opportunities for customers. Furthermore, utilities are notoriously slow when it comes to innovation, and limited when investing in research and development in the electric sector. Approaches that encourage utility ownership not only risk creating stranded assets and higher costs, but also will ultimately limit utilities’ options in the marketplace by allowing them to pick winners and losers.

Grid modernization projects can create particular anti-competitive concerns where utilities

¹ EFCA is a national advocacy group that promotes the use of distributed energy resources. EFCA members provide DERs such as distributed solar generation, thermal and battery energy storage, microgrids, demand management, EV charging stations, demand response, and energy efficiency products. Members also provide solar and other renewable generation in all shapes and sizes including products for residential, commercial, government, community solar, and utility scale applications. EFCA’s current members include Silevo, LLC, SolarCity Corporation, NRG Energy, Inc., and ZEP Solar, LLC.

² See, e.g., DOC at 16-17, OAG at 16-18, Fresh Energy at 4, MESC at 3.

³ See, e.g., DOC at 9, OAG at 6, 17, Fresh Energy at 2.

may be building systems to integrate more distributed energy resources (“DERs”). To drive down costs, increase options for consumers, and encourage more innovation in the electricity sector, grid modernization should be geared towards integrating customer and third-party owned DERs, and enabling the utility to take advantage of all of the value streams such DERs provide. **For that reason, oversight of any grid modernization project that raises anti-competitive concerns is critical. Non-utility ownership should always be considered and compared to utility ownership as part of the prudence review.**

2. The Commission Should Develop Long Term Rules for Future Reports and Certifications

Parties to this proceeding raise critical issues of timing. For example, the OAG recommends that the work in Docket 15-556 on grid modernization be completed before any projects will be certified. OAG notes that the docket is likely to culminate in a white paper in 2016, emphasizing that this will provide some clarity to the high-level policy goals that will define what grid modernization investments are to be considered prudent.⁴ The DOC recommends that a rulemaking be initiated to define both the criteria that would apply to a project being proposed for certification, and the specific consequences of certification.⁵

These parties raise important procedural and practical concerns. A rulemaking would provide a clear and consistent process with concrete definitions for the types of projects that should be considered, requirements for certification, and the consequences of certification. As MCEA noted, the types of projects that can apply for certification are broad and could be more fully scoped through a rulemaking to distinguish them from what might be pursued through a general rate case.⁶ A rulemaking would also be the appropriate venue to develop rules that require other utilities to report on their distributed generation investments and grid modernization progress, as was proposed by DOC.⁷ Furthermore, beginning the rulemaking with a statement of principles from the grid modernization docket would help solidify how a utility should prioritize projects and bring them forward for certification.

EFCA’s initial comments supported moving forward with the certification of Xcel’s proposed distribution grid modernization projects, subject to modifications. However, OAG’s and DOC’s recommendations are the better path to ensure clarity and consistency going forward. These initial projects will set an important precedent for the future of grid modernization in Minnesota, and it would be inappropriate to certify them before basic guiding principles and procedures are established. A rulemaking process could codify procedures that support the principles underlining EFCA’s recommendations—principles including consumer choice, consumer value, and fair market competition—so that a debate of these principles is not required each time a project is up for certification. **Accordingly, EFCA recommends that the Commission reject Xcel’s request for certification, finalize its high-level policy statements on grid modernization, and then open a rulemaking to set parameters for the distribution grid modernization certification process.**

3. Replies to Specific Statements

EFCA responds to specific statements or proposals by other commenters.

⁴ OAG at 17.

⁵ See, e.g., DOC at 10.

⁶ MCEA at 2-3.

⁷ DOC at 14.

a. A Cost-Benefit Analysis of Every Project Should not be Strictly Required Where a Competitive Solicitation is Utilized

Xcel commented that “it is reasonable to relax guidelines around cost-effectiveness, such that pilots and demonstration projects should not be subject to traditional cost-benefit analysis or have to demonstrate they are a least cost option.”⁸ MCEA similarly asserts that “[p]ositive net present value in year one should not be the most important factor” for certification, given that some projects will build incremental value as platforms for future infrastructure.⁹ EFCA partially agrees and partially disagrees with these statements. EFCA agrees that certain projects should not be required to demonstrate a positive net present value in year one or demonstrate that quantifiable benefits exceed costs. These criteria would not be appropriate for investments that strategically enable new technologies or for some innovative technologies where sufficient information does not currently exist to accurately quantify benefits. For such projects, the extent to which the project advances Minnesota’s grid modernization vision is more important than the result of strict cost-benefit calculations. However, EFCA disagrees with Xcel’s suggestion to minimize the emphasis on cost-effectiveness. All projects should achieve their stated goals at the lowest reasonable cost, and EFCA believes that a competitive bidding process is the most prudent method to ensure cost-effectiveness (more information about competitive bids follows below).

At the same time, parties universally agreed that Xcel should be required to provide more information in its report, particularly related to costs. For example, MCEA recommended that Xcel’s ADMS project be bolstered by a detailed business case and roadmaps with costs, benefits, and an implementation timeline.¹⁰ OAG explained that a full vetting of alternatives is a precursor to determining whether a project is prudent, and this requires that Xcel substantiate its cost estimates.¹¹ DOC recommended that Xcel clearly show the impact of the project on key reliability metrics (SAIDI, SAIFI, CAIDI) and state policy goals.¹²

As suggested above, a straightforward way to synthesize Xcel’s concerns that it not be required to prove that quantifiable benefits strictly exceed costs, with other parties’ concerns that it is not sufficiently vetting the costs of its proposals, is to adopt EFCA’s initial recommendation for Xcel to integrate more opportunities for competitive bidding into its grid modernization proposal process. Xcel can demonstrate that its costs are reasonable by conducting requests for proposals for competitive grid services, and reviewing the options that the market can provide. To the extent possible, these competitive solicitations should identify needs, rather than prescribe solutions, to give the marketplace freedom to innovate and offer higher value and lower cost solutions. Guidelines should be established to ensure that these solicitations are fair and open, so that they give assets that are not owned by utilities the opportunity to serve grid needs.

Through the rulemaking process discussed above, the Commission could authorize a rebuttable presumption that a grid modernization project proposal is cost-effective where utilities (1) conduct a competitive bidding process, and (2) demonstrate that the costs associated with projects proposed for certification are in line with the results of the bidding process. **EFCA recommends that a utility seeking certification of grid modernization projects should be required to incorporate competitive solicitations, and the results would go toward both consideration of alternatives and reasonableness of costs.**

⁸ Xcel at 6.

⁹ MCEA at 2.

¹⁰ MCEA at 2.

¹¹ OAG at 8.

¹² DOC at 11-12.

b. DOC's Interconnection Auction Should Not be Implemented

The DOC proposed that the outputs of the statutorily required distributed generation (“DG”) opportunities study feed into an interconnection auction process. According to DOC, utilities that request rider recovery of distribution projects should auction off the interconnection points that they identify through the study. DOC states that this would reward quality, whereas interconnection queues typically reward being “first in line.”¹³ However, the proposed auction mechanism would create more problems than it would solve. This auction mechanism could unfairly increase the interconnection costs for developers that interconnect at preferred sites, which would actually penalize developers for choosing those locations. (It is also unclear where the extra proceeds from these auctions would go.) Developers would also not have sufficient information to value interconnection points and submit appropriate bids, because under current practices, the majority of interconnection costs are not discovered until utilities perform interconnection studies, which is well after an application has been submitted. Furthermore, auctioning off entire interconnection points has the potential to reward large investors at the expense of small projects, which would disadvantage residents and especially low-income projects. The auction proposal could also create a competitive disadvantage between utilities and third parties, given that utilities would not need to pay to access interconnection points under DOC’s proposal.

Fundamentally, this auction mechanism represents the wrong mindset regarding the interconnection process in a modern grid. A modern grid should embrace an “open access” principle, where all parties have the right to connect to the grid to purchase or sell energy services. Under the open access principle, the goal of the interconnection process should be to facilitate fast interconnection at a reasonable cost anywhere on the grid. Concerns about interconnection timelines would be best addressed by reforming the interconnection process to incorporate more automation, standardized technical screens and system upgrade guidelines, and transparency. Shifting focus to developing an auction mechanism would likely take emphasis away from these more fundamental and important reforms and improvements to the interconnection process.

EFCA interprets the problem that DOC wants to solve as how to ensure that high-quality projects are developed in areas that maximize their benefits to customers of the utility. That problem is better approached by quantifying the value of the diverse benefits that distributed resources can provide, and providing opportunities for distributed resources to monetize those values through tariffs, solicitations, or other market mechanisms. **EFCA supports improvements to interconnection practices and procedures, but DOC’s proposal for an auction mechanism is neither cost-based nor beneficial to Minnesota DG customers, and should therefore be rejected.**

c. Utility-Ownership of Storage is Not Necessary to Maximize Customer Benefits and Could Lead to Unnecessary Costs

The Minnesota Energy Storage Collaborative (“MESC”) suggested that utility-controlled storage would have the “most likely positive benefit/cost ratio” in deferring distribution upgrades, according to a 2013 Strategen Consulting study.¹⁴ But this statement must be considered in the appropriate context. The Strategen study explored only four use cases, which included customer ownership and customer control, utility ownership and utility control, and customer ownership with

¹³ DOC at 15.

¹⁴ MSEC at 4.

shared utility and customer control.¹⁵ This last use case assumes that customers own storage and that the utility is allowed to control it only when it is idling.¹⁶ However, the study did not include a use case where a third party owned and controlled utility-side resources on behalf of utilities. The use case that MESC points to as having the highest benefit/cost ratio is differentiated from the other utility-side, utility-controlled storage use case because the model added the ability for distributed storage to provide ancillary services like frequency regulation into the Midcontinent Independent System Operator (“MISO”).¹⁷

EFCA agrees that the benefits that storage could provide to ancillary services markets are huge. However, they are not specific to utility ownership. Because the use cases generally treated ownership and control as resting with the same entity, the report did not model the proposal that EFCA originally made, which was that Xcel should hold a competitive solicitation for third-party grid services providers who could offer different ownership and control propositions through different technology combinations. **EFCA recommends that to the extent the Strategen Consulting study’s results are considered in this proceeding, they should be viewed in the full context of what use cases were and were not incorporated.**

d. Other Utilities Should File Distributed Generation Progress Reports

The DOC recommended that the Commission encourage other Minnesota utilities, including investor-owned, cooperative, and municipal utilities, to report on their progress toward developing distributed generation resources and modernizing their distribution grids. Currently, Xcel is the only Minnesota utility that is required to file a biennial transmission and distribution plan. However, DOC notes that the statute does not limit the Commission’s ability to encourage other utilities to file grid modernization reports.¹⁸ DOC states that Otter Tail Power Company (“OTP”) and Minnesota Power (“MP”) should file distribution studies that demonstrate viable DG interconnection points on their distribution systems, and necessary distribution upgrades.¹⁹ DOC further recommends that municipal and cooperative utilities within the Midwest Transmission Owners (“MTO”) group provide comment on similar actions they have taken.²⁰

EFCA supports these proposals for multiple reasons. First, grid modernization produces benefits—like increasing access to renewable energy, enhancing reliability, and providing customers with choices—that should be available to all Minnesotans, regardless of which utility’s service territory they live or work in. Second, DOC’s proposal would open up the possibility that other utilities might seek to engage in, and certify, grid modernization investments outside of a rate case.²¹ While Xcel has frequently come to the Commission for rate cases, OTP did not bring a

¹⁵ STRATEGEN CONSULTING, WHITE PAPER ANALYSIS OF UTILITY-MANAGED, ON-SITE ENERGY STORAGE IN MINNESOTA (2013) 23-24, available at <http://mn.gov/commerce-stat/pdfs/utility-managed-storage-study.pdf>.

¹⁶ *Id.*

¹⁷ *Id.* at 37, 47, 49-50, 54. MISO is actively discussing opportunities related to energy storage, and particularly medium-term storage. See generally Energy Storage Workshop, MISO Market Subcommittee, Jan. 5, 2016, available at <https://www.misoenergy.org/Library/Repository/Meeting%20Material/Stakeholder/MS/2016/20160105/20160105%20MS%20Item%2006%20Energy%20Storage%20Workshop.pdf>; Amanda Durish Cook, *MISO Preparing a Place for Energy Storage in Tariff*, RTO INSIDER, Jan. 11, 2016, available at <http://www.rtoinsider.com/miso-energy-storage-tariff-20988/>.

¹⁸ DOC at 18.

¹⁹ DOC at 14.

²⁰ DOC at 14-15; DOC Supplemental at 2-3.

²¹ DOC at 19.

general rate case in Minnesota for over 20 years, from 1986 until 2007.²² Finally, by sharing grid modernization plans, utilities have an opportunity to coordinate activities so that distributed resource providers do not need to follow drastically different rules and procedures in each utility's territory.

While the Municipal Entities correctly note that the distribution grid modernization portions of the statute were tied to "a utility operating under a multiyear rate plan approved by the commission,"²³ the Commission has the ability to influence aspects of their distribution operations.²⁴ However, Minnesota Power is correct that this proceeding is not the appropriate place to consider obligations for utilities other than Xcel.²⁵ DOC's proposal should be considered either with the Grid Modernization proceeding or the certification rulemaking. **Accordingly, utilities besides Xcel should be encouraged to file reports on grid modernization and their progress to incorporate distributed generation, to ensure that Minnesota as a whole benefits.**

e. DG Study Requirements

EFCA and MCEA's initial comments on the DG opportunities study draw from experience in California, and recommend that Xcel conduct distribution circuit hosting capacity analyses and publish the results in accessible, downloadable formats.²⁶ In this vein, EFCA supports OAG's assessment that the purpose of the DG opportunities study is to "promote transparency and a sharing of information so that the Commission can develop a process for ensuring, and improving, the efficiency of a utility's distribution system for ratepayers."²⁷ However, the OAG then recommends that the Commission seek guidance from parties to the grid modernization proceeding on how to what characteristics and outputs the study should have. However, rather than seek feedback from parties to that proceeding, it would be more efficient for the Commission roll this issue into the rulemaking proposed by DOC for the certification process, given that the statute requires the study to be part of the biennial report.²⁸ Because the language of the statute emphasizes that the study be conducted to "support the continued development of distributed generation resources,"²⁹ the study should include at least the parameters that EFCA and MCEA put forward in their initial comments.

EFCA applauds any early steps Xcel may be taking towards calculating hosting capacities for Minnesota feeders. However, any such activities would not obviate the need for addressing hosting capacity analysis through rulemaking. It is important to have transparency, public input, and official guidance regarding hosting capacity analysis, so that it can provide the best value to Minnesota's grid modernization efforts.

f. Provide Fair Notice to Affected Stakeholders on Proposed Distribution Grid Modernization Projects

Multiple parties commented on the need to provide notice to stakeholders about proposed

²² See Otter Tail Power Company, Company History, available at <https://www.otpc.com/about-us/company-history/> (last visited Jan. 20, 2016).

²³ MINN. STAT. §216B.2425 Subd. 2(e), as referenced at Joint Comments of Municipal Entities at 2.

²⁴ See, e.g., MINN. STAT. §216B.029 Subd. 1(a) ("The commission and each cooperative electric association and municipal utility shall adopt standards for safety, reliability, and service quality for distribution utilities. Standards for cooperative electric associations and municipal utilities should be as consistent as possible with the commission standards.").

²⁵ Minnesota Power Reply at 2.

²⁶ MCEA at 3.

²⁷ OAG at 18-19.

²⁸ MINN. STAT. §216B.2425 Subd. 8.

²⁹ *Id.*

grid modernization projects. Both the DOC and MCEA et al. commented that the Commission should apply elements of the Rule 7848.1900 notice requirements related to transmission to distribution grid modernization proposals.³⁰ Xcel disagreed, noting that distribution projects do not raise the same concerns as transmission projects.³¹

Certainly, distribution grid upgrades are fundamentally different than long-distance transmission projects, which raise issues related to land use and ownership. However, distribution upgrades for grid modernization still invoke certain values analogous to transmission, in particular, values related to competition, community, and clean energy. The Belle Plaine battery storage project is an example of this: Xcel put it forward because the City of Belle Plaine's substation is nearing capacity.³² In addition to parties that could provide competitive services to manage this issue, the City of Belle Plaine, builders, developers, and other parties may wish to be aware of Xcel's plans. Without supporting a specific permutation of the existing rules, EFCA recommends that the Commission ensure that those types of stakeholders would receive notice of grid modernization projects. EFCA also supports MCEA's comments that traditional types of notice—like maps of transmission lines—may not be sufficient to enable full participation.³³ **Therefore, EFCA recommends that a modified form of the existing notice process for transmission systems be applied to utility requests to certify distribution grid modernization proposals.**

Conclusion

EFCA thanks the Commission for the opportunity to provide these reply comments on Xcel's first Biennial Grid Modernization Distribution Report.

Dated: February 22, 2016

Respectfully submitted,

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³⁰ DOC at 6 (recommending that “for the instant docket, the Commission require the content of the notice to include the items listed in Minnesota Rules 7848.1900 subpart 4.”); MCEA at 3 (“The Commission should borrow from 7848.1900’s notice content provisions but add to it in order to account for the fact that distribution projects will likely come in more forms than transmission projects do, and they will require different types of notice content depending on project type.”)

³¹ Xcel at 6.

³² Xcel Biennial Report at 16.

³³ MCEA at 3.

CERTIFICATE OF SERVICE

I, Philip Jett, hereby certify that I have this day served a true and correct copy of the following document to all persons at the addresses indicated below or on the attached list by electronic filing, electronic mail, courier, interoffice mail or by depositing the same enveloped with postage paid in the United States Mail.

REPLY COMMENTS OF THE ENERGY FREEDOM COALITION OF AMERICA

In the Matter of Xcel Energy's 2015 Biennial Distribution Grid Modernization Report
MPUC Docket No. E002/M-15-962

Dated this 22nd day of February, 2016.

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Kramer	Jon	jk2surf@aol.com	Sundial Solar	Electronic Service	No
Krause	Michael	michaelkrause61@yahoo.com	Kandiyo Consulting, LLC	Electronic Service	No
Krikava	Michael	mkrikava@briggs.com	Briggs And Morgan, P.A.	Electronic Service	No
Lacey	Matthew	Mlacey@greenergy.com	Great River Energy	Electronic Service	No
Lahd	Holly	lahd@fresh-energy.org	Fresh Energy	Electronic Service	No
Larson	Joel	jl Larson@minnkota.com	Minnkota Power Cooperative, Inc.	Electronic Service	No
Larson	Douglas	dlarson@dakotaelectric.com	Dakota Electric Association	Electronic Service	No
Larson	James D.	james.larson@avantenergy.com	Avant Energy Services	Electronic Service	No
Lehman	Paul J.	paul.lehman@xcelenergy.com	Xcel Energy	Electronic Service	No
Leischow	Dean	dean@sunriseenergyventures.com	Sunrise Energy Ventures	Electronic Service	No
Levenson Falk	Annie	annie.levensonfalk@lec.leg.mn	Legislative Energy Commission	Electronic Service	No

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Paper Service Member(s)

Last Name	First Name	Company Name	Address	Delivery Method	View Trade Secret
Baker	Kenneth	Wal-Mart Stores, Inc.	2001 SE 10th St., Bentonville, AR-72716-5530	Paper Service	No
Eide Tollefson	Kristen	R-CURE	28477 N Lake Ave, Frontenac, MN-55026-1044	Paper Service	No
Houston	Ashley	N/A	120 Fairway Rd, Chestnut Hill, MA-24671850	Paper Service	No
Ketchum	Julie	Waste Management	20520 Keokuk Ave, Lakeville, MN-55044	Paper Service	No
Levchak	Deborah Fohr	Basin Electric Power Cooperative	1717 East Interstate Avenue, Bismarck, ND-585030564	Paper Service	No
Nelson	Ben	CMMPA	459 South Grove Street, Blue Earth, MN-56013	Paper Service	No
Reinhardt	John C.	Laura A. Reinhardt	3552 26Th Avenue South, Minneapolis, MN-55406	Paper Service	No
Sedgwick	Dean	Itasca Power Company	PO Box 457, Bigfork, MN-56628-0457	Paper Service	No

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