

**STATE OF MINNESOTA  
BEFORE THE PUBLIC UTILITIES COMMISSION**

Beverly Jones Heydinger	Chair
Nancy Lange	Commissioner
Dan Lipschultz	Commissioner
Matt Schuerger	Commissioner
John Tuma	Commissioner

2015 Biennial Report – Distribution Grid  
Modernization

DOCKET NO. E999/M-15-962

**REPLY COMMENTS OF THE OFFICE  
OF THE ATTORNEY GENERAL**

The Office of the Attorney General–Residential Utilities and Antitrust Division (“OAG”) respectfully submits these Reply Comments to respond to two recommendations made by the Department of Commerce regarding the 2015 Biennial Report – Distribution Grid Modernization (“Report”) filed by Northern States Power Company (“Xcel” or “the Company”).

First, in its Comments, the Department recommended that cost recovery for certified distribution projects should be capped at the level proposed in the certification petition.<sup>1</sup> To the extent that utilities incur costs in excess of their initial estimate, the Department recommended that they be recoverable only if the utility can justify the costs in a subsequent rate case.<sup>2</sup> The Department noted that the Commission uses the same procedure for certificate of need proceedings, and recommended that it be applied to distribution projects that are certified as well. The OAG agrees that this is a reasonable step that will provide protection for ratepayers. It will incentivize utilities to ensure that the cost estimates presented in certification petitions are

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<sup>1</sup> Department Comments, at 9 (Jan. 4, 2016).

<sup>2</sup> *Id.* at 9.

accurate and reliable, which will improve the information available when certification decisions are made.

Second, the Department recommended that the Commission begin a rulemaking process to create new rules for certifying distribution projects.<sup>3</sup> The Department is correct that Minnesota Rules part 7848 does not squarely address certification of distribution projects, grid modernization reports, or distribution studies. Many of the Rules contain specific references to transmission or high voltage projects, which would generally mean they do not apply to distribution projects. And other rules that are appropriate for transmission projects may not be necessary in the context projects at the distribution level. As a result, it is likely that a rulemaking will be required at some time.

It is less clear, however, whether the best time to begin a rulemaking is right now. For example, the Commission likely needs to make a decision on the instant petition much sooner than a rulemaking could be completed. It will also be necessary to consider how a rulemaking would proceed given the Commission's investigation into grid modernization in Docket 15-556. If the Commission develops foundational principles or processes in the grid modernization investigation, they could be promulgated through a rulemaking at the end of the investigation docket. At the same time, it would be possible to address any inconsistencies or changes that are required to the transmission certification rules, or additional distribution certification rules. But at this time, we are in the early stages of the grid modernization investigation and have not yet developed the principles that will be used going forward. A rulemaking that is opened now would not have the benefit of any lessons learned through the investigation process. It could also be a distraction from the work that will be done in the investigation docket. Ultimately, the

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<sup>3</sup> *Id.* at 17.

OAG agrees with the Department that a rulemaking will be necessary at some point, but the Commission will need to consider carefully whether now is the best time to do so.

Dated: January 22, 2016

Respectfully submitted,

LORI SWANSON  
Attorney General  
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*s/ Ryan Barlow*  
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February 22, 2016

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

**Re: *Xcel Energy's 2015 Biennial Distribution Grid Modernization Report***  
**Docket No. E002/M-15-962**

Dear Mr. Wolf:

Enclosed and e-filed in the above-referenced matter please find the *Reply Comments of the Office of the Attorney General—Residential Utilities and Antitrust Division*.

By copy of this letter, all parties have been served. An Affidavit of Service is also enclosed.

Sincerely,

*s/ Ryan Barlow*

RYAN P. BARLOW  
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Enclosure

**AFFIDAVIT OF SERVICE**

**Re: Xcel Energy’s 2015 Biennial Distribution Grid Modernization Report  
Docket No. E002/M-15-962**

STATE OF MINNESOTA   )  
  ) ss.  
COUNTY OF RAMSEY   )

Judy Sigal hereby states that on February 22, 2016, I e-filed with eDockets the ***Reply Comments of the Office of the Attorney General—Residential Utilities and Antitrust Division*** and served the same upon all parties listed on the attached service list by email, and/or United States Mail with postage prepaid, and deposited the same in a U.S. Post Office mail receptacle in the City of St. Paul, Minnesota.

*s/ Judy Sigal*  
Judy Sigal

Subscribed and sworn to before me  
this 22<sup>nd</sup> day of February, 2016.

*s/ Patricia Jotblad*  
Notary Public

My Commission expires: January 31, 2020.

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