



NARUC

National Association of Regulatory Utility Commissioners

Considering Stakeholder Engagement in Distribution System Planning

NARUC/NASEO/LBNL Distribution System Planning
Peer-Sharing Webinar

August 13, 2026

AGENDA

- NASEO and NARUC intros
- Presentations
 - Natalie Mims-Frick, LBNL
 - Olivia Corless, DC DOEE
 - Hanna Terwilliger, Minnesota PUC
- Group Discussion



About NASEO

- The only national non-profit association for the governor-designated energy officials from each of the 56 states and territories
- Serves as a resource for and about the State Energy Offices through topical committees, regional dialogues, and informational events that facilitate peer learning, best practice sharing, and consensus building
- Advances the interests of the State and Territory Energy Offices before Congress and the Administration
- Learn more at www.naseo.org

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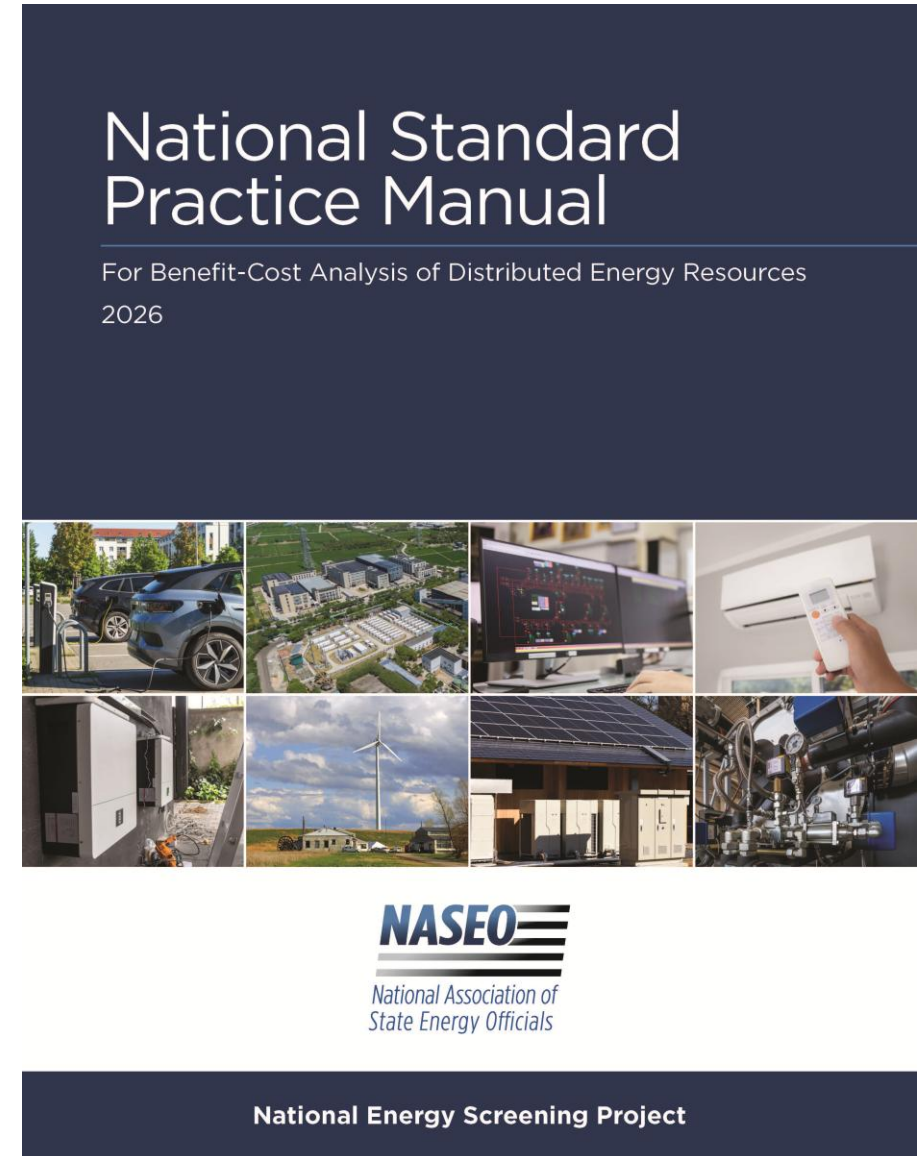
Ben Brouwer, Montana

Janine Benner, Oregon

Curtis Thayer, Alaska

Existing NASEO Resources on Distribution Planning

- [NASEO Distribution Planning Training for State Energy Offices](#)
 - Distribution Planning Fundamentals
 - Engagement with Utilities and Industry Partners
 - Examples of State Energy Office Engagement in Distribution Planning
 - Resources and Tools
- [2026 National Standard Practice Manual](#)
 - Comprehensive framework for cost-effectiveness assessment of DERs
- [OpenBCA Tool](#)
 - Free, open-source desktop application
 - A transparent, standardized framework for evaluating the benefits and costs of grid-edge resources



EXISTING NARUC RESOURCES ON DISTRIBUTION SYSTEM PLANNING

- Late 2024-early 2025 in-person trainings “2.0” Planning for Load Growth and Local Resources – [Action Planning Workshop Reference](#)
- Late 2024 Virtual Workshops “Planning for a Modern Distribution System” - [Planning for a Modern Distribution System - NARUC](#)
- Late 2023-early 2024 in-person trainings “Distribution System Planning and Resilience” - [Regional Training: Planning for Distribution Systems, Distributed Energy Resources, and Resilience | Energy Markets & Planning; IDSP Training March 2024](#)
- Early 2023 Peer-sharing webinars on IDSP - [Peer-Sharing Webinars for Public Utility Commissions on Integrated Distribution System Planning - NARUC](#)



Stakeholder Engagement in Distribution System Planning *Requirements & Practices*

Natalie Mims Frick

Contributions by Guillermo Pereira, Ph.D.

Peer-Sharing Webinars for Public Utility Commissions and State Energy Offices on Distribution System Planning
August 13, 2026

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ENERGY TECHNOLOGIES AREA | ENERGY ANALYSIS DIVISION | ENERGY MARKETS & PLANNING

The Role of Stakeholder Engagement in Distribution System Planning

- Stakeholder engagement in distribution system planning (DSP) can involve participation by a wide variety of interested or concerned parties
 - Parties can provide feedback on planning objectives, inputs, methods, scenarios, and priority investments
 - Groups engaged in the planning process may include other state agencies, local governments, Tribes, community organizations, utility consumer advocates, and others
- Engagement may include activities related to delivering information, promoting collaboration, and gathering stakeholder feedback
- Effective stakeholder engagement has a clearly defined scope and goals

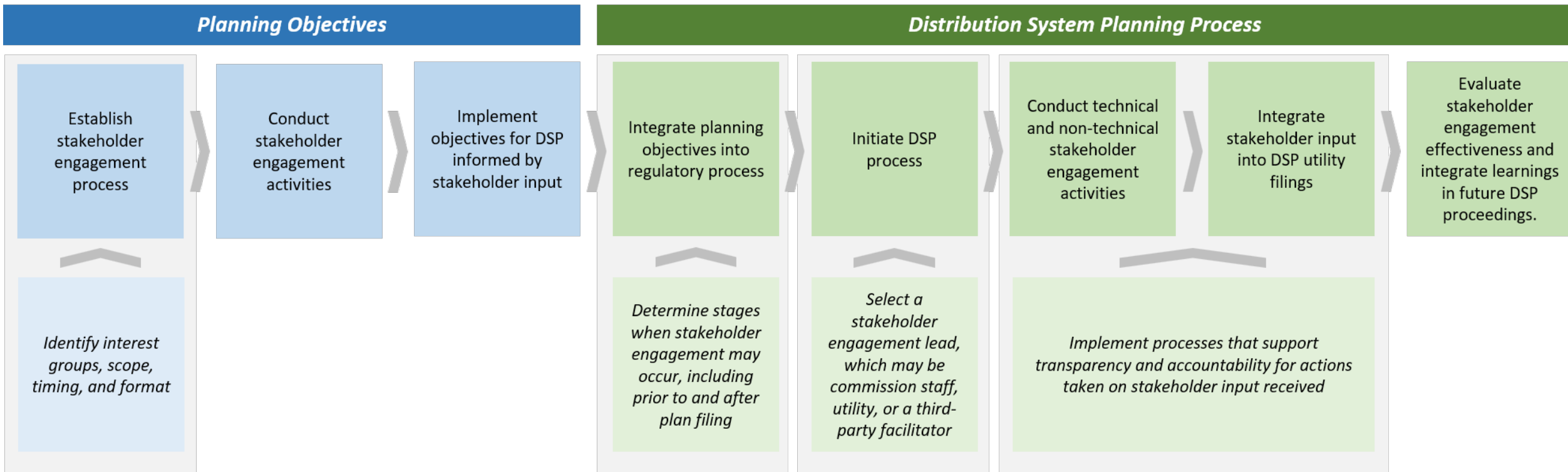
Source: [Lawrence Berkeley National Laboratory, 2024, Interactive Decision Framework for Integrated Distribution System Planning](#)

The Role of Stakeholder Engagement in Distribution System Planning (2)

- Stakeholder engagement can improve the quality of information the utility considers in its DSP, and regulators consider in their decision-making related to utility plans and cost recovery requests for related expenditures
- Stakeholder engagement also can help develop solutions to near- and long-term grid needs that reflect complementary perspectives and priorities and contribute to broad support for utility actions
- In addition, such engagement can foster greater coordination and transparency, contributing to better planning processes

Source: [Lawrence Berkeley National Laboratory, 2024, Interactive Decision Framework for Integrated Distribution System Planning](#)

The Role of Stakeholder Engagement in Distribution System Planning (3)

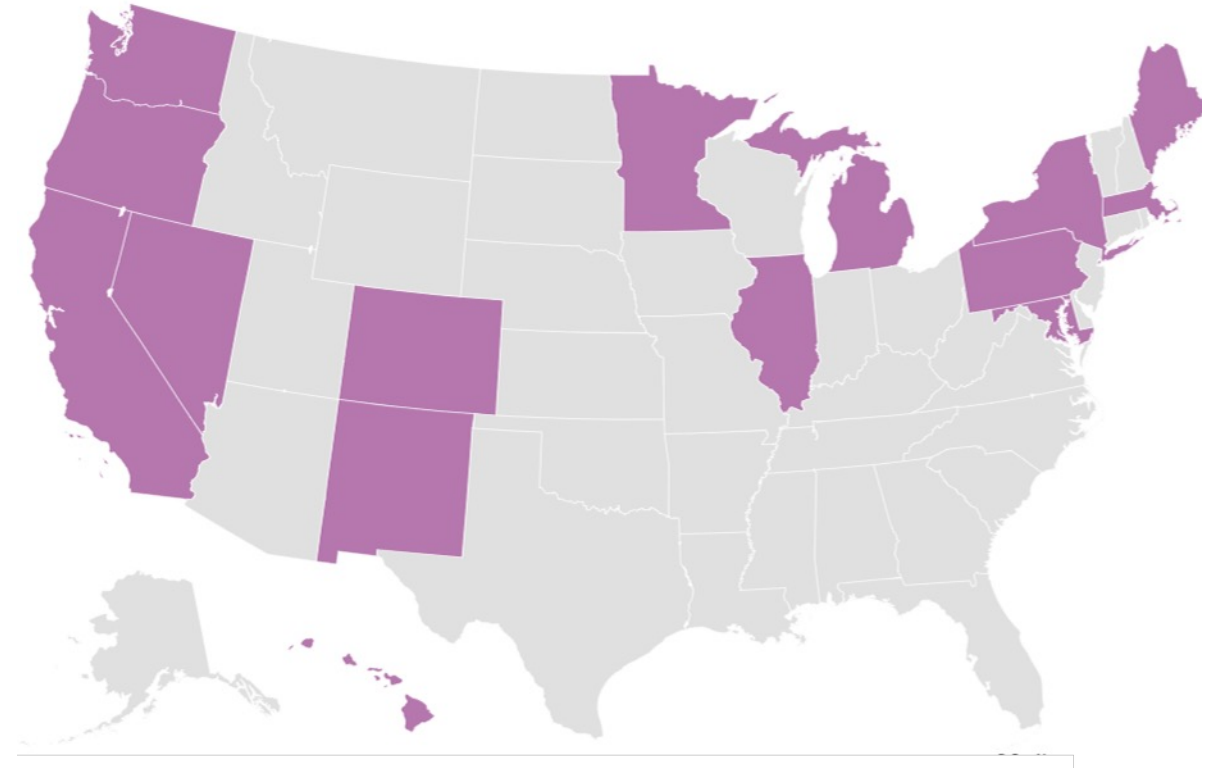


Source: Adapted from [Lawrence Berkeley National Laboratory, 2024, Interactive Decision Framework for Integrated Distribution System Planning](#)

State Requirements for Stakeholder Engagement in DSP

As of May 2026, 15 states have provisions related to stakeholder engagement in DSP

- [CA](#), [CO](#), [HI](#), [IL](#), [MA](#), [MD](#), [ME](#), [MI](#), [MN](#), [NM](#), [NV](#), [NY](#), [OR](#), [PA](#), [WA](#) *
- [CT](#) has a proposed decision that includes stakeholder engagement requirements for utility DSP filings



***Unless otherwise noted, all state references in this section can be accessed with links provided in the first bullet**

Source: [Lawrence Berkeley National Laboratory, 2026, State Electric Distribution System Planning Practices](#)

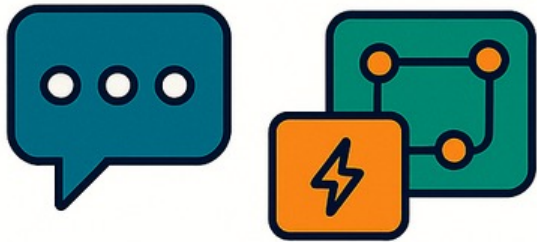
Types of Stakeholder Engagement Throughout the DSP Process



**Prior to the distribution
system plan filing**



**Reporting on distribution
system plan implementation**



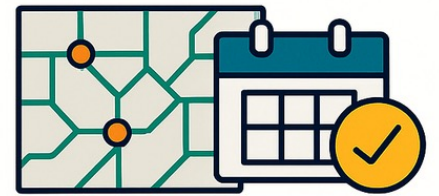
**After distribution system
plan filing**



**Changes to future
distribution system plan
filings**

Stakeholder Engagement Prior to DSP Filing (1)

State Practice



14 states have provisions for utilities to conduct stakeholder engagement prior to DSP filing

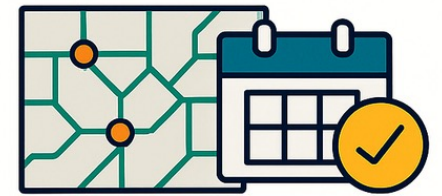
- ❑ CA, CO, CT, HI, IL, MA, ME, MD, MI, MN, NM, NV, NY, OR, WA
- ❑ Proposed provisions in CT also include stakeholder engagement prior to the DSP filing

Stakeholder engagement prior to the DSP filing may focus on:

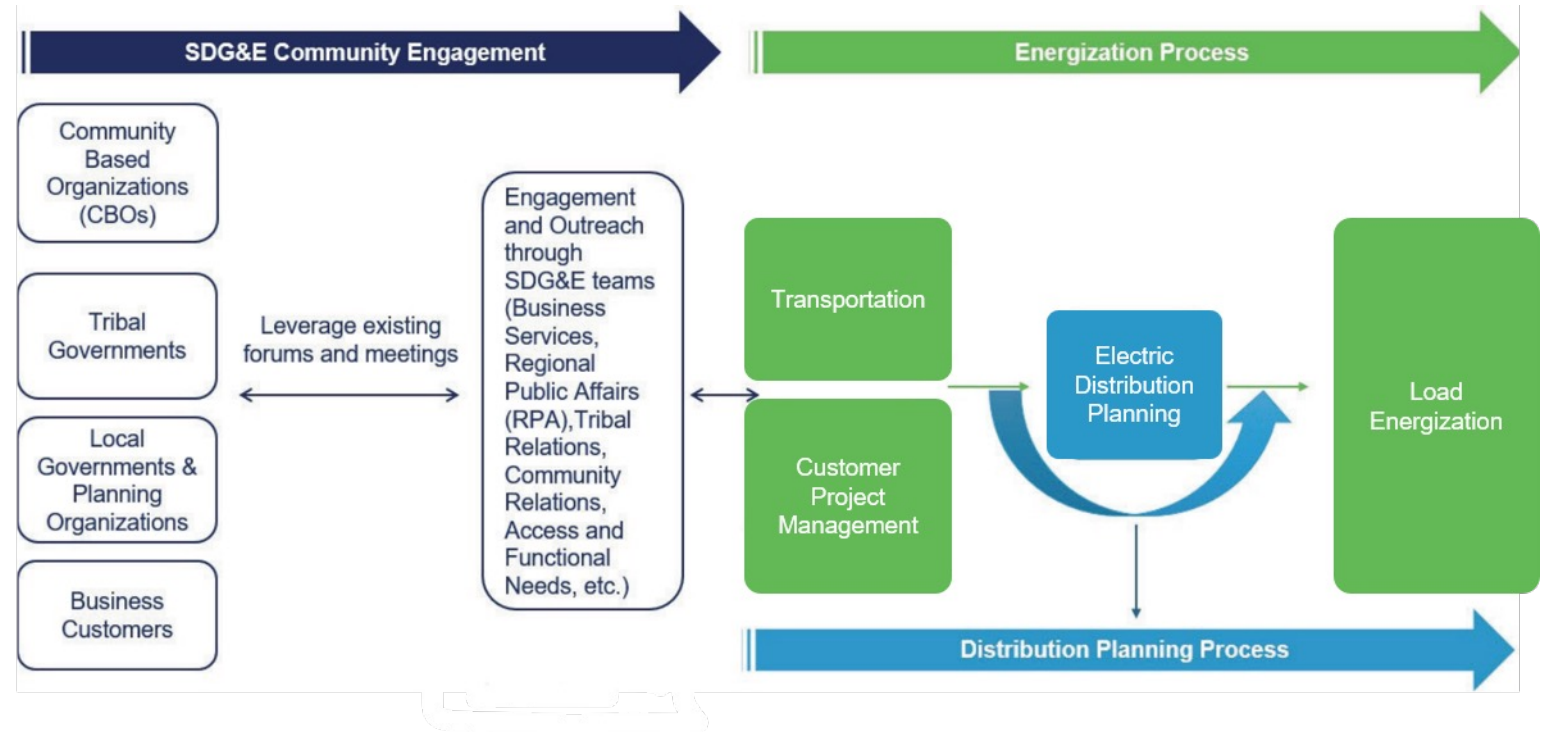
- ❑ Discussing the content of DSP filings and obtaining input and feedback on future programs (e.g., CO, CT, MA, ME, NV)
- ❑ Soliciting input on planning assumptions (e.g., CT, HI, MD, ME, NM, OR)
- ❑ Convening sessions dedicated to technical discussions or community awareness (e.g., HI, IL)
- ❑ Identifying planning priorities (e.g., ME)

Stakeholder Engagement Prior to DSP Filing (2)

Utility Example



SDG&E's [2026 Community Engagement Plan](#) informs distribution system planning and load energization processes.



Source: Adapted from [SGD&E, 2026, Community Engagement Plan](#)

Reporting on DSP Implementation (1)

State Practice



11 states have provisions for utilities to report on stakeholder engagement on DSP filings

- ❑ CA, CO, HI, IL, ME, MI, MN, NM, NV, OR, WA
- ❑ Proposed provisions in CT also include reporting on DSP implementation

Reporting on stakeholder engagement on DSP filings may focus on:

- ❑ Describing stakeholder engagement plan and supporting processes (e.g., CA, CO, NM)
- ❑ Identifying events and stakeholders engaged (e.g., MI, NY)
- ❑ Documenting all stakeholder input received and resulting utility action (e.g., ME, OR)

Reporting on DSP Implementation (2)

Utility Example



Locations of in-person meetings held

Versant, in its [2026 Integrated Grid Plan](#), describes its stakeholder engagement efforts, including:

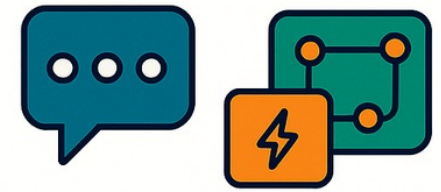
- Information on in-person and virtual meetings held, including milestone meetings
- Community surveys
- Summary of feedback received and solution identification



Source: [Versant, 2026, Integrated Grid Plan](#)

Stakeholder Engagement After DSP Filing (1)

State Practice



Four states have provisions for utilities to conduct stakeholder engagement after filing their DSPs

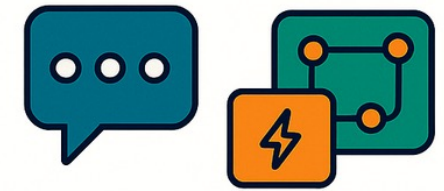
- MN, NY, OR, PA

Reporting on stakeholder engagement on DSP filings may focus on:

- Communicating the final plan and its outcomes (e.g., PA)
- Engaging specific groups of stakeholders to inform implementation decisions (e.g., NY, OR), such as grid-edge resource management systems (e.g., MN)

Stakeholder Engagement After DSP Filing (2)

Utility Example



- The Joint Utilities of New York conduct bi-annual stakeholder webinars
 - ▣ Central Hudson Gas and Electric, Con Edison, New York State Electric & Gas, National Grid, Orange and Rockland, and Rochester Gas and Electric
- In 2026, the webinars focused on:
 - ▣ Grid-edge resource participation in the wholesale market
 - ▣ Interconnection
 - ▣ Hosting capacity
 - ▣ Data sharing
 - ▣ Electric vehicles
 - ▣ Grid flexibility
- For each topic, the utilities provide an update on recent developments, planned implementation, and answer stakeholder questions

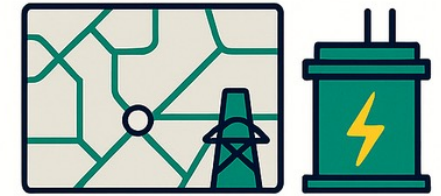
The screenshot displays the Joint Utilities of New York website. The header includes the logo, navigation links (ABOUT US, RESOURCES AND OPPORTUNITIES, ELECTRIC VEHICLES), and a search bar. A large banner image shows two utility workers in safety gear with the text "Stay updated on Joint Utilities initiatives". Below the banner, a sidebar on the left contains links for "WHO WE ARE", "STAKEHOLDER INFORMATION", and "CONTACT US". The main content area is titled "Current Stakeholder Information" and features a "Subscribe" section with a form for email, company, title, and position. To the right, a "Bi-annual Stakeholder Webinar" section lists past events from 2023 to 2026, each with links to presentation decks and recorded webinars.

Year	Webinar Date	Topics	Resources
2026	January 14, 2026	Grid-edge resource participation in the wholesale market, Interconnection, Hosting capacity, Data sharing, Electric vehicles, Grid flexibility	presentation deck or recorded webinar
	June 17, 2026	Grid-edge resource participation in the wholesale market, Interconnection, Hosting capacity, Data sharing, Electric vehicles, Grid flexibility	presentation deck or recorded webinar
2025	June 16, 2025	Grid-edge resource participation in the wholesale market, Interconnection, Hosting capacity, Data sharing, Electric vehicles, Grid flexibility	presentation deck or recorded webinar
	June 27, 2024	Grid-edge resource participation in the wholesale market, Interconnection, Hosting capacity, Data sharing, Electric vehicles, Grid flexibility	presentation deck or recorded webinar
2024	December 10, 2024	Grid-edge resource participation in the wholesale market, Interconnection, Hosting capacity, Data sharing, Electric vehicles, Grid flexibility	presentation deck or recorded webinar
	July 21, 2023	Grid-edge resource participation in the wholesale market, Interconnection, Hosting capacity, Data sharing, Electric vehicles, Grid flexibility	presentation deck
2023	December 14, 2023	Grid-edge resource participation in the wholesale market, Interconnection, Hosting capacity, Data sharing, Electric vehicles, Grid flexibility	presentation deck or recorded webinar

Source: [Joint Utilities of New York, 2026, Stakeholder Information](#)

Changes to Future Distribution System Plan Filings (1)

State Practice



- Five states have provisions for utilities to engage stakeholders to inform and incorporate changes to future DSP filings
 - ▣ CO, MI, MN, HI, [NV](#)

- Stakeholder engagement to inform changes in future DSP filings may focus on:
 - ▣ Web portals to enable data sharing (e.g., CO, MI)
 - ▣ Load forecasting methodology (e.g., MN)
 - ▣ Non-wires alternative analysis (e.g., [NV](#))
 - ▣ Hosting capacity analysis (e.g., NV)

Best Practices (1)

- Facilitate stakeholder feedback across all stages of DSP
 - Including during the development of guidance and requirements, before and after plan filing, and when reporting on plan implementation
- Establish roles and responsibilities for outreach, planning, hosting, and facilitating stakeholder meetings
- Include ample time for stakeholders to become familiar with DSP processes and for utilities to incorporate stakeholder feedback
- Require transparency and accountability from utilities on feedback received, which may include guidance on documenting feedback and actions taken in response to feedback
- Implement stakeholder engagement approaches that are inclusive of technical and non-technical audiences.

Source: Adapted from [Lawrence Berkeley National Laboratory, 2024, Interactive Decision Framework for Integrated Distribution System Planning](#)

Best Practices (2)

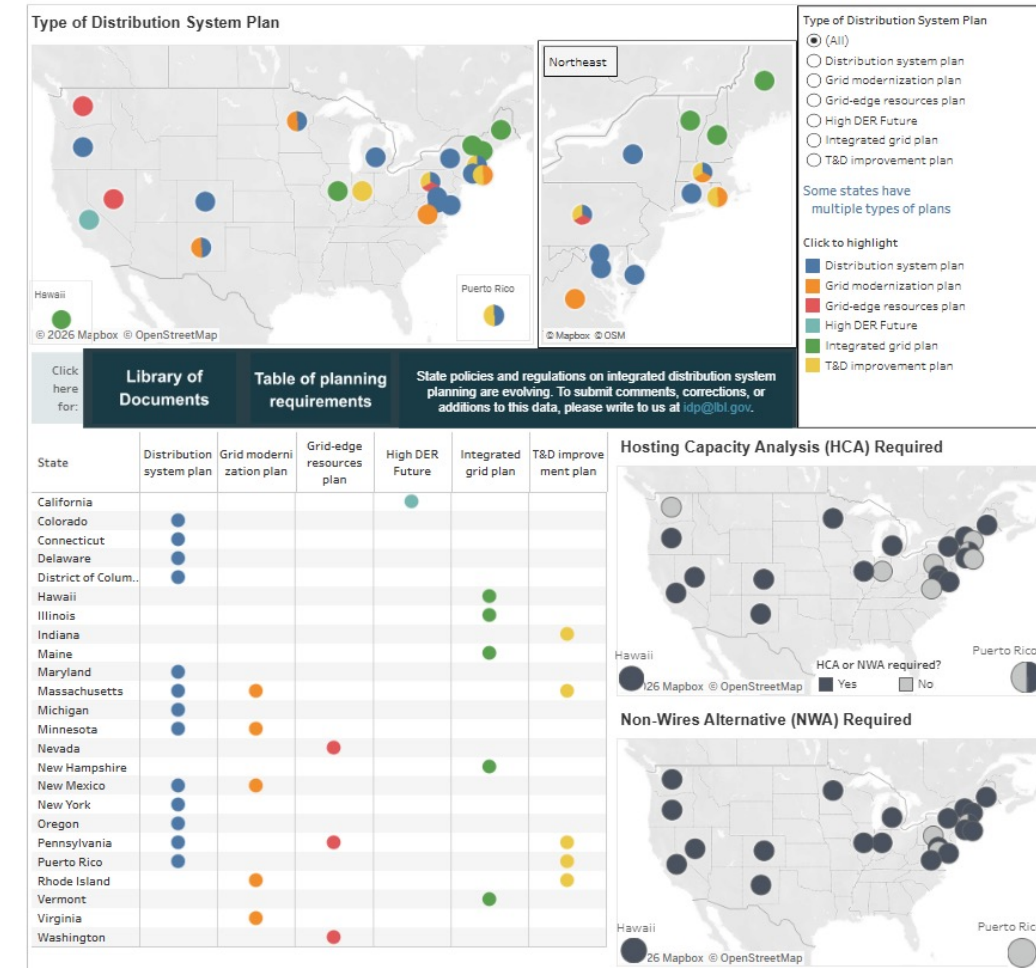
- Compensate stakeholders for their time, resources, and expertise provided in commission proceedings
- Ensure information for stakeholders is available in advance of meetings, easily accessible, and publicly available to the extent possible
- Support stakeholder access to modeling tools and data, to the extent possible, to promote transparency and identification of planning alternatives
- Establish ongoing stakeholder engagement processes to promote continued education and contribute to discussions to improve IDSP practices

Source: Adapted from [Lawrence Berkeley National Laboratory, 2024, Interactive Decision Framework for Integrated Distribution System Planning](#)

LBNL Resources

State Distribution Planning Requirements: Data Visualization & Online Catalog

- Dataviz, online catalog, individual state summaries, and document library provide information on legislative and regulatory requirements for electric companies to file some type of distribution system plan in 22 states, Puerto Rico, and DC. Updated in May 2026.
- Data visualization provides **an interactive interface** to identify state-by-state requirements for:
 - ▣ Types of distribution plans filed
 - ▣ Non-wires alternatives/hosting capacity analyses
- Detailed information by state:
 - ▣ Legislative and regulatory requirements, proceedings, and orders
 - ▣ Filed utility plans and type of regulatory action taken
 - ▣ State planning goals and objectives
 - ▣ Term of action plan
 - ▣ **Stakeholder engagement**
 - ▣ Substantive elements, including large loads, interconnection, scenario analysis, and affordability



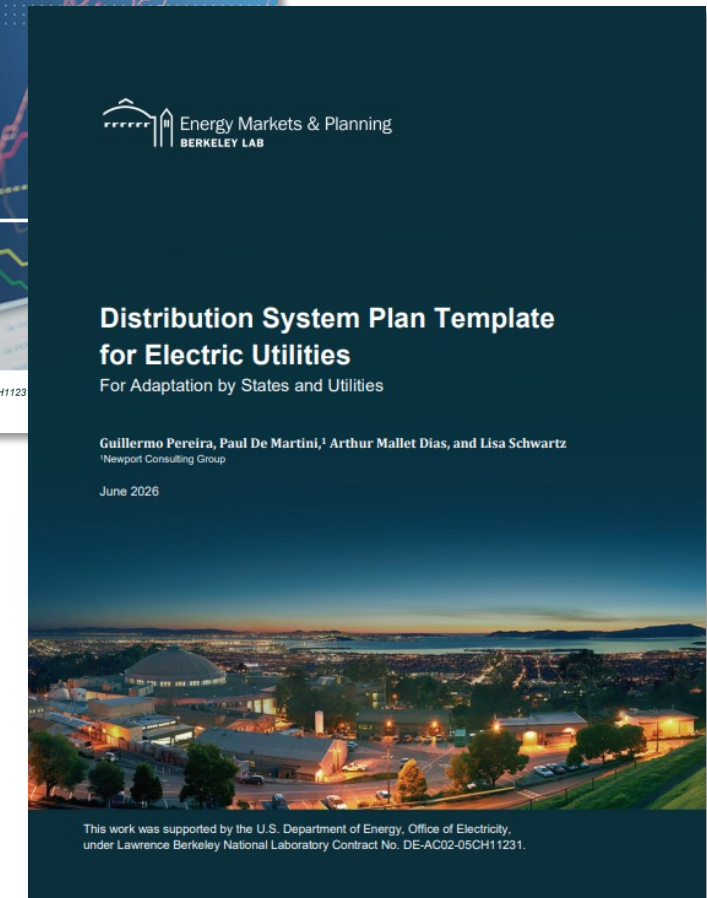
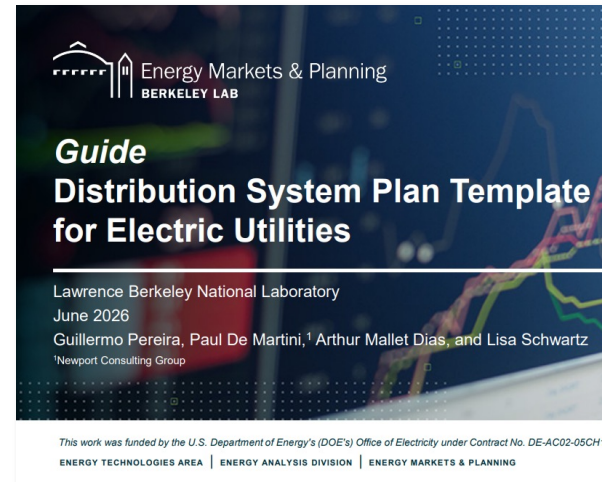
<https://emp.lbl.gov/state-electric-distribution-system-planning-practices>

Distribution System Plan Template and Guide for Electric Utilities for Adaptation by States and Utilities

- Template and companion guide for structuring distribution system plans.
- The template covers 10 key sections in utility distribution system plans and underlying topics

Executive Summary

- ▣ Planning Objectives
- ▣ Current Distribution System
- ▣ **Planning Approach (includes stakeholder engagement details)**
- ▣ Asset Management, Reliability and Resilience
- ▣ O&M Expenses
- ▣ Capacity Expansion Planning
- ▣ Solution Identification
- ▣ Cost-effectiveness
- ▣ Implementation

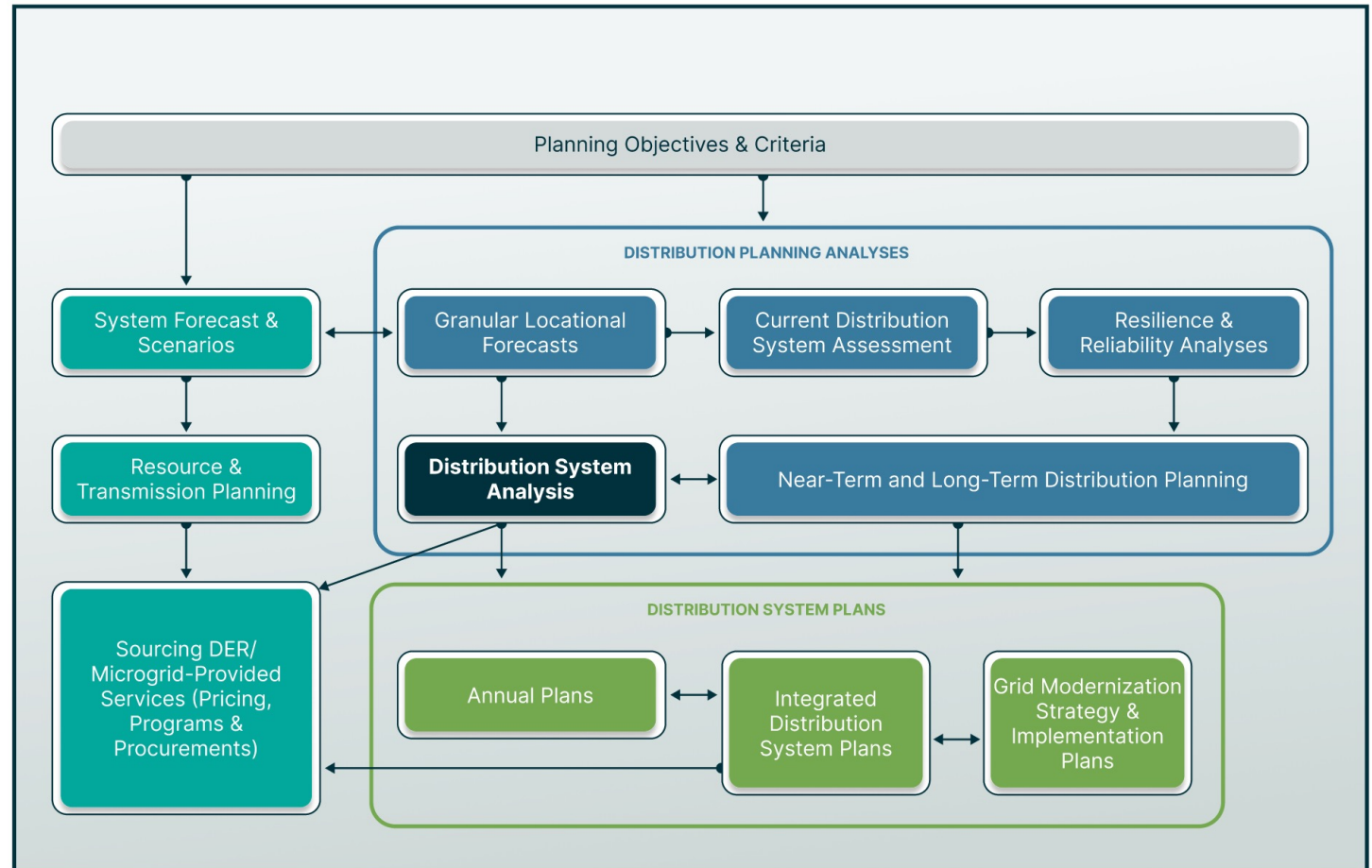


<https://eta.lbl.gov/publications/distribution-system-plan-template>

Interactive IDSP Framework (1)

Topics included

- Hosting Capacity Analysis
- Value of GERS
- Interconnection
- Forecasting Loads and GERS/EVs
- Distribution Investment Strategy
- Functional Requirements Analysis
- NWA Procurements
- Geotargeting Programs
- **Stakeholder Engagement**
- Multi-Objective Decision-making
- Cost-Effectiveness Framework for Investments
- Threat-Based Risk Assessment
- Worst-Performing Feeder Analysis
- Asset Management Strategy
- Coordinated Planning
- Scenario Analysis



<https://emp.lbl.gov/projects/integrated-distribution-system-planning>

Interactive IDSP Framework (2)

What's included for each topic?

- Overview
 - ▣ What is it?
 - ▣ Why is it important?
 - ▣ Key questions (Q&A)
- Roles and Responsibilities
- Best Practices
- State Practices
- Utility Practices
- Flow Chart (e.g., inputs/outputs)
- Tools
- Annotated Resources List

State Objectives and Stakeholder Engagement

Stakeholder Engagement

STATE OBJECTIVES >

STAKEHOLDER ENGAGEMENT >

Stakeholder Engagement

OVERVIEW	ROLES AND RESPONSIBILITIES	BEST PRACTICES	STATE PRACTICES	UTILITY PRACTICES	FLOW CHART	TOOLS	RESOURCES
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OVERVIEW

What is stakeholder engagement?

Stakeholder engagement for integrated distribution system planning (IDSP) involves participation by a wide variety of interested or concerned parties to provide feedback on planning objectives, inputs, methods, scenarios, and priority investments. Groups engaged in the planning process should represent a broad range of stakeholders affected by the utility's distribution system. This may include other state agencies, local governments, Tribes, community organizations, utility consumer advocates, defined priority populations such as low-income households, environmental justice organizations, and others. Stakeholder engagement is key to **advancing equity in IDSP**.

Regulatory commissions may establish guidelines or requirements for utilities to develop and implement stakeholder engagement plans. Engagement may include activities related to delivering information, promoting collaboration, and gathering stakeholder feedback. Effective stakeholder engagement requires a clearly defined scope and goals and specifying how the utility will consider stakeholder input in the planning process. In addition, transparency of roles and responsibilities is necessary to support trust and accountability and enable meaningful collaboration and stakeholder input.

Why is stakeholder engagement important?

Stakeholder engagement can improve the quality of information the utility considers in its IDSP process and utility regulators consider in their decision making related to utility plans and cost recovery requests for rate-of-return.



Contact

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For more information

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Acknowledgements

This work was funded by the U.S. Department of Energy, Office of Electricity, under Contract No. DE-AC02-05CH11231.

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District of Columbia IDSP: Stakeholder Engagement

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Energy Program Specialist



GOVERNMENT OF THE
DISTRICT OF COLUMBIA
MURIEL BOWSER, MAYOR

Status of IDSP Development

- **November 2024:** The DC PSC issued a Notice of Inquiry creating a new formal case for IDSP, and sought comments on a strawman proposal outlining objectives and procedures for an IDSP process in DC.
- **July 2025:** The Commission issued an order directing that an IDSP WG be convened and that the WG submit a proposed IDSP framework along with both consensus and non-consensus recommendations, among other deliverables.
- **February 2026:** First WG convened by PSC consultants, identified three phases:
 - Phase 1: Framework Development (ending August 2026)
 - Phase 2: Clarification (Fall 2026-Spring 2027)
 - Phase 3: Evaluation of Pepco's filed IDSP (Fall 2027-Spring 2028)
- **July 2026:** Commission directed IDSP WG to continue Phase 1 with an extended report deadline of February 2027.

DOEE's Role as a State Energy Office

Framework Development:

- DOEE worked with the DC Office of People's Counsel and LBNL technical experts to develop a joint proposal framework based on national best practices ahead of the WG.
- Participates as WG member, continually revising the original framework based on WG discussions, feedback, and additional best practices.

IDSP Process:

- Providing research, additional data, and technical review of the submitted plans.
- Ongoing stakeholder in standing WG.

Current Stakeholder Engagement Proposal

Prefiling:

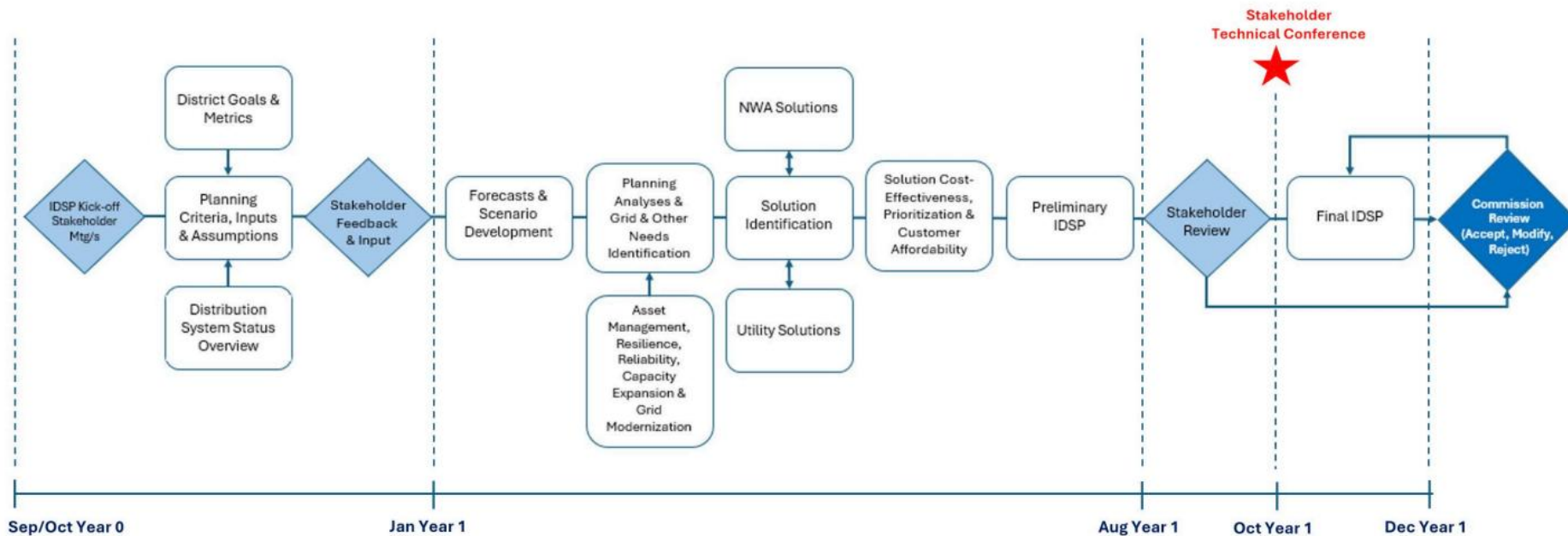
1. Utility must hold initial outreach meetings to engage the community, customers, and other interested parties in a timely manner to ensure input can be incorporated into the development of the IDSP. At least half of these meetings must be held outside normal business hours in locations convenient for customers.
2. The Utility shall collect stakeholder inputs and feedback on planning criteria, data, and assumptions for consideration in the IDSP.

Post filing:

1. Annual Technical Conference for the Draft IDSP and Annual Updates. (Pepco Maryland)
2. Commission-led Standing IDSP Working Group.
3. Written comment periods for the Draft IDSP, Final IDSP, and Annual IDSP Updates after filing.

Proposed IDSP Stakeholder Engagement

IDSP Development Process

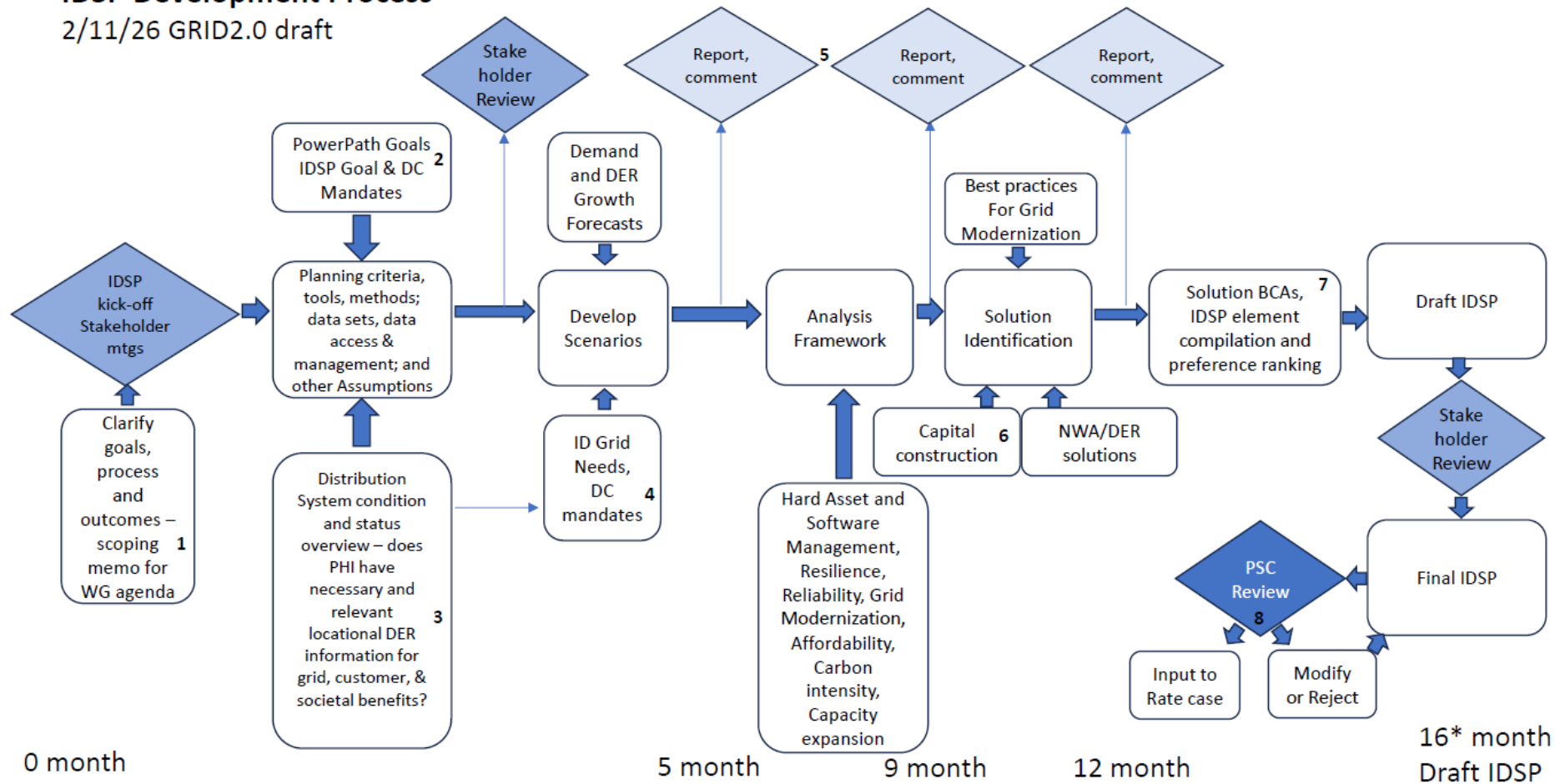


*NB: Start and end calendar months are illustrative

Alternative Proposal

IDSP Development Process

2/11/26 GRID2.0 draft



Thank you!

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Stakeholder Involvement in Minnesota IDPs

Hanna Terwilliger | Analyst Coordinator - Distribution System Planning



The ideas expressed are the views of the presenter, and not the Minnesota Public Utilities Commission.

Distribution Planning Objectives

The Commission is facilitating comprehensive, coordinated, transparent, integrated distribution plans to:

- Maintain and enhance the safety, security, reliability, and resilience of the electricity grid, at fair and reasonable costs, consistent with the state's energy policies;
- Enable greater customer engagement, empowerment, and options for energy services;
- Move toward the creation of efficient, cost-effective, accessible grid platforms for new products, new services, and opportunities for adoption of new distributed technologies; and,
- Ensure optimized utilization of electricity grid assets and resources to minimize total system costs.
- Provide the Commission with the information necessary to understand Xcel's short-term and long-term distribution system plans, the costs and benefits of specific investments, and a comprehensive analysis of ratepayer cost and value.

Commission review of distribution system plans are not meant to preclude flexibility for utilities to respond to dynamic changes and on-going necessary system improvements to the distribution system; nor is it a prudence determination of any proposed system modifications or investments.

(Source: [IDP Filing Requirements](#) as adopted in 2018 and last updated June 3, 2025)

Timing and Frequency

- Biennial
- Filing Date: November 1
 - Xcel in odd numbered years
 - Other utilities even numbered years
- Timeframe: 10-year Plan with 5-year action plan
- Stakeholder engagement: Utilities must hold at least 1 stakeholder meeting prior to filing, covering DER Forecasts, 5-Year Investment Plan and System Capabilities (at minimum)

Integrated Distribution Plan Filing Requirements

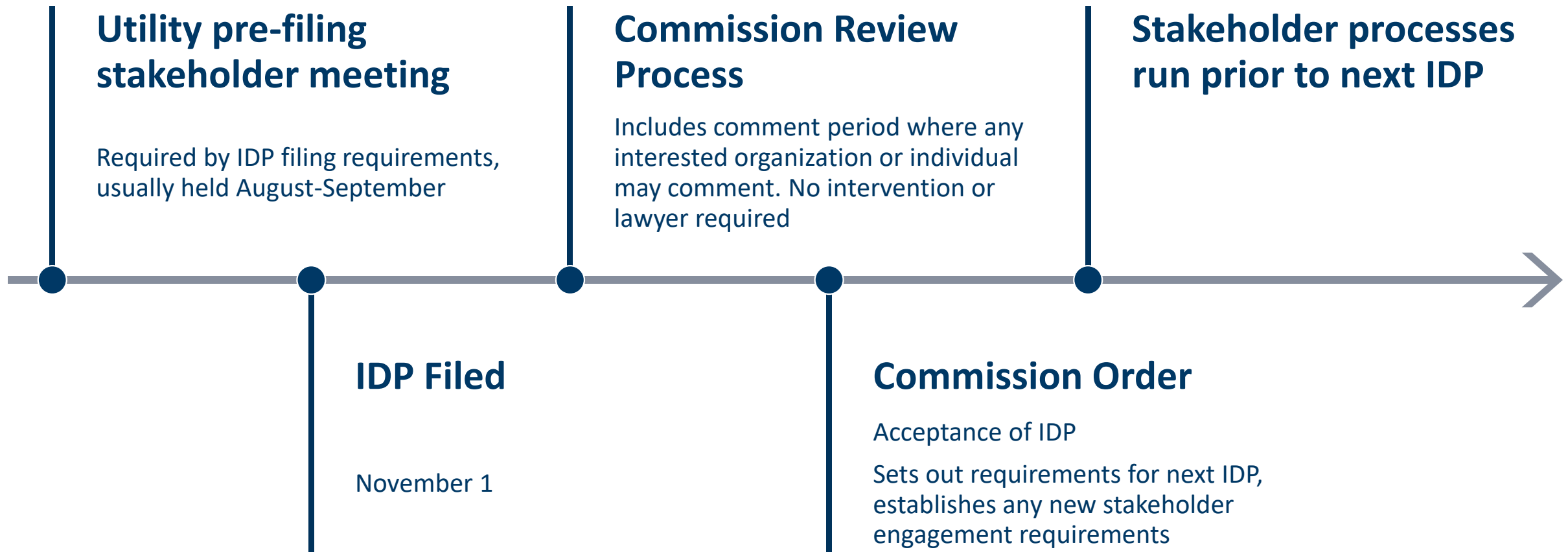
[MN PUC IDP Webpage](#)

Content Requirements

Each IDP is tailored and specific to each utility and expected to diverge further over time.

- A. Baseline Data
 - System
 - Financial
 - DER
- B. Hosting Capacity and Interconnection
- C. DER Futures Analysis (Scenario Planning)
- D. Long-Term Distribution System Investment Plan (5 & 10 year)
- E. Non-Wires Alternatives Analysis
- F. Transportation Electrification Plans

General IDP Timeline



Stakeholder process considerations

- Should it be a formal or informal process?
- Who should lead the process?
 - Commission, Utility, Third-party
- Is this a one-off meeting, limited in duration, or permanent process?

Formal vs Informal

Formal

- Good option when there is direction that a framework or process should be developed, but there is likely to be disagreement on some items
- Useful to have scope and timeline set out by Commission
- Formalized membership, may be limited to enable productive meetings
- Longer time frame, may be ongoing
- Commission staff or neutral party as facilitator

Informal

- Good option when there is widespread agreement and consensus is likely, but exact language needs to be determined
- Good for specific tasks that are limited in duration and have a clear outcome
- May be conducted primarily via email and infrequent, as needed meetings
- Commission, utility, or third-party facilitator

Example: Informal process to update filing requirements

Order Point: The Commission delegates authority to the Executive Secretary to work with [utilities], the Department, and stakeholders to modify the IDP filing requirements to include discussions of the impacts of beneficial electrification where appropriate. The Commission delegates authority to the Executive Secretary to approve via notice a stakeholder agreement on amended filing requirements if one is reached.

- Task: Update IDSP filing requirements to include impacts of electrification
- Engagement Type: Informal workgroup, led by Commission Staff
- Agreement that filing requirements should be updated but need to figure out technical language. Likely consensus could be reached without a need for a formal Commission decision
- Result: consensus updates adopted via notice

Reference Materials (*Docket 23-452*)

[Order](#) Accepting 2023 IDP

[Notice](#) of Workgroup Processes

[Notice](#) of Approval of Updated Filing Requirements

Example: Utility-led process on Cost-Benefit Analysis

Order Point: Xcel shall engage in additional stakeholder discussions on approaches to apply cost-benefit analyses, or a similar type of evaluation, strategically to program-level investments for discretionary projects for certification or cost recovery proceedings.

- Issue: desire for enhanced analysis of increasing distribution expenditures
- Task: develop cost-benefit analysis for discretionary distribution investment programs
- Engagement Type: utility led stakeholder process
- Commission directed development of CBAs, but left exact methodology up to utility, with requirement to engage stakeholders
- Result: two CBAs included with 2025 IDP filing (Docket 25-142), Commission action to require similar CBAs with future cost recovery and IDP filings.

Reference Materials (*Docket 23-452*)
[Order](#) Accepting 2023 IDP
[Notice](#) of Workgroup Processes
CBA Workshop 1 [Invite](#) and [Materials](#)
CBA Workshop 2 [Invite](#) and [Materials](#)

Example: Proactive Grid Upgrade Workgroup

Order Language:

Delegate authority to the Executive Secretary to establish a stakeholder process to develop a framework on cost allocation and proactive upgrades for Xcel Energy. The Commission sets the following guidelines for the process:

- The goal of the workgroup is to develop proposals for proactive upgrades and cost allocation for Commission consideration and possible adoption.
- The process does not need to reach consensus but should aim to clearly identify areas of agreement and disagreement to facilitate a Commission decision.
- The Commission establishes a goal of completing the stakeholder process by July 1, 2025. At the conclusion of the process there will be a notice and comment period on any proposals followed by a Commission decision.
- Proposals should address, at minimum, the following topics:

Formal Workgroup Takeaways

- Define end-product and key definitions at the outset
- Prioritize key topics and be willing to push some to subsequent phases
- Identify areas of agreement/disagreement instead of trying for consensus
- Draft language early, make use of subgroups

Thank You!

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DISCUSSION QUESTIONS, 1 OF 2

- How are public utility commissions, state energy offices, and utilities engaging stakeholders as part of the distribution system planning process?
- Who facilitates the stakeholder process in your state (e.g., utility, PUC staff, SEO, third-party) and who pays for it?



DISCUSSION QUESTIONS, 2 OF 2

- What types of stakeholders are currently participating in your distribution system planning process?
 - Do they appropriately represent all customers impacted by distribution system investments?
 - What opportunities are there to improve engagement?
- Are utilities in your state required to report on the results of stakeholder feedback, or to respond to stakeholder feedback?
 - Who is responsible for tracking improvements in stakeholder engagement?
 - What opportunities are there to improve how utilities consider stakeholder feedback?



Closing Question



What are your needs and interests related to distribution system planning?

What issues are you struggling with or need more help with?

