

## CLEAN, revised Decision Options

Below is a new, renumbered set of compiled decision options based on November 7, 2022 filings from parties. Staff has noted which parties support each decision option and whether it is a new/modified decision option or original from the October 28, 2022 Briefing Papers.

Staff has dropped the following original decision options from the briefing papers that are no longer support by any party: 1a, 1b, 1d-f, 3a, 3c, 6, 10, 12, 13, 15, 22

## Party Preferred Decision Options

Minnesota Power	1a-e, 5a-d, 8, 13, 20a-h, 20j, 23, 24a-e, 27a, 29, 35a-c, 36a-f, 38, 43, 44
Department of Commerce	9a-f, 10, 11, 18, 20a-j, 21, 39, 40, 41a-f, 42, 44
Office of the Attorney General	12, 19, 20 a-j, 21, 32, 42 If the Commission adopts DO 1a-e, OAG recommends DO 3a-g as a modification If the Commission adopts DO 13, OAG recommends DO 16 as an addition
Clean Energy Organizations	1a-e, 5a-d, 13, 17 or 19, 26a-d, 28a-e, 30, 31, 32, 33a-b, 39, 40, 41a-f
Citizens Utility Board	2a-d, 6a-d, 9a, 10, 14, 19, 26a-d, 28a-e, 31, 32, 33a-b, 34, 37, 44, 45
Large Power Intervenors	4a-g, 7a-d, 15, 21
LIUNA	1a-e, 5a-d, 13

## Joint Decision Option

Several parties and docket participants filed a set of “Joint Decision Options.”

The Joint Decision Options are: 1a-e, 5a-d, and 13

Signatories to the Joint Decision Options are: Minnesota Power, Clean Energy Organizations (Fresh Energy, Sierra Club, Clean Grid Alliance and the Minnesota Center for Environmental Advocacy), LIUNA, City of Cohasset, Itasca Economic Development Corporation (“IEDC”), International Brotherhood of Electrical Workers Local 31 (“IBEW Local 31”), International Union of Operating Engineers Local 49 (“Local 49”), North Central States Regional Council of Carpenters, Itasca County.

## Decision Options

### Approval of the Resource Plan

#### Renewable Energy Procurement

*Staff note: Decision Options 1-4 are all variations on the new proposed “Joint Decision Options” from MP et al. The Commission may wish to adopt any one of the versions as written, or adopt modifications from one or multiple of the DOs.*

- DO 1 is the original Joint Decision Option.
- DO 2 is CUB’s preferred edits to the Joint DO
- DO 3 is the OAG’s preferred edits to the Joint DO
- DO 4 is LPI’s preferred edits to the Joint DO

1. Approve Minnesota Power’s 2021 Plan with the following modification: Require Minnesota Power to procure cost-effective resources to meet its customer and renewable product needs between 2025 and 2030 by:
  - a. acquiring at least 300 MW and up to 400 MW of wind with at least 200 MW in service by 2026 as practicable;
  - b. acquiring up to 300 MW of regional/in-service territory or net-zero solar; and
  - c. implementing storage demonstration projects of at least 100 MWh and up to 500 MWh by 2026 as practicable.
  - d. MP will work with organized labor and other interested stakeholders to maximize socioeconomic benefits to customers and host communities by prioritizing utility investment in its service territory, use of local labor for construction and permanent staffing, and development of apprenticeship pathways when procuring new energy resources.
  - e. For projects located in or adjacent to existing host communities, MP will engage with city officials early in the project development process for input and collaboration on issues, including siting, to ensure that projects effectively support the community’s own transition plans.

(MP, CEO, LIUNA. *New – replaces original DO 1 and original DO 3*)

[OR]

2. Approve Minnesota Power’s 2021 Plan with the following modification: Require Minnesota Power to procure cost-effective resources to meet its customer and renewable product needs between 2025 and 2030 by:
  - a. acquiring at least 300 MW and up to 400 MW of carbon free resources wind with at least 200 MW in service by 2026 as practicable;
  - b. acquiring up to 300 MW of regional/in-service territory or net-zero solar; and
  - c. implementing storage demonstration projects of at least 100 MWh and up to 500 MWh by 2026 as practicable, which shall be subject to the bidding process requirements for resource acquisitions, notwithstanding the size of the storage projects.
  - d. MP will work with organized labor and other interested stakeholders to maximize socioeconomic benefits to customers and host communities by prioritizing utility investment in its service territory, use of local labor for

construction and permanent staffing, and development of apprenticeship pathways when procuring new energy resources.

- e. For projects located in or adjacent to existing host communities, MP will engage with city officials early in the project development process for input and collaboration on issues, including siting, to ensure that projects effectively support the community's own transition plans.

(CUB. *New - modification of 1 above*)

[OR]

3. Approve Minnesota Power's 2021 Plan with the following modification: Require Minnesota Power to procure cost-effective resources to meet its customer and renewable product needs between 2025 and 2030 by:
  - a. issuing a request for proposals ("RFP") for wind and solar generation and procuring approximately 200 MW of new renewable generation acquiring at least 300 MW and up to 400 MW of wind with at least 200 MW in service by 2026 as practicable;
  - b. acquiring an additional up to 300 400 to 500 MW of regional/in-service territory or net-zero solar-renewable generation by 2030; and
  - c. issuing an RFP for implementing storage demonstration projects of at least 100 MWh and up to 500 MWh by 2026 as practicable.
  - d. RFPs shall not include geographic restrictions and shall include the option for both power purchase agreements and build-own-transfer proposals.
  - e. Approval of all resource acquisitions will be contingent upon a finding that the new resources are cost-effective at the time of procurement.
  - f. MP will work with organized labor and other interested stakeholders to maximize socioeconomic benefits to customers and host communities by prioritizing utility investment in its service territory, use of local labor for construction and permanent staffing, and development of apprenticeship pathways when procuring new energy resources.
  - g. For projects located in or adjacent to existing host communities, MP will engage with city officials early in the project development process for input and collaboration on issues, including siting, to ensure that projects effectively support the community's own transition plans.

(OAG, if Commission adopts Joint DOs. *New - modification of 1 above*)
  
4. Approve Minnesota Power's 2021 Plan with the following modification: Require Minnesota Power to procure cost-effective carbon free resources to ~~meet its customer and renewable product needs~~ satisfy its capacity and Energy requirements between 2025 and 2030 by:
  - a. acquiring at least 300 MW and up to 400 MW of wind with at least 200 MW in service by 2026 as practicable;
  - b. acquiring up to 300 MW of regional/in-service territory or net-zero solar; ~~and~~
  - c. implementing storage demonstration projects of at least 100 MWh and up to 500 MWh by 2026 as practicable; and
  - d. Working collaboratively with large power customers and large light and power customers to pursue at least 50 MW of additional long-term demand response to address future resource adequacy changes.

- e. MP will work with organized labor and other interested stakeholders to maximize socioeconomic benefits to customers and host communities by prioritizing utility investment in its service territory, use of local labor for construction and permanent staffing, and development of apprenticeship pathways when procuring new energy resources.
  - f. For projects located in or adjacent to existing host communities, MP will engage with city officials early in the project development process for input and collaboration on issues, including siting, to ensure that projects effectively support the community's own transition plans.
  - g. In its next resource plan, Minnesota Power will include a service quality study of its next preferred plan and thoroughly demonstrate how system reliability and resource adequacy will be maintained as it transitions to more intermittent generating resources.
- (LPI. New - modification of 1 above)

### Boswell Energy Center

*Staff note: Decision Options 5-7 are variations on the new proposed "Joint Decision Options" from MP et al. The Commission may wish to adopt any one of the versions as written, or adopt modifications from one or multiple of the Options*

- DO 5 is the original Joint Decision Option.
  - DO 6 is CUB's preferred edits to the Joint DO
  - DO 7 is LPI's preferred edits to the Joint DO
5. Require MP to cease coal operations at BEC Unit 3 by December 31, 2029 and BEC Unit 4 by 2035 at the latest. Capacity and energy replacement options including transmission solutions for both units will be evaluated during the next resource plan. MISO long range transmission planning and associated processes will be incorporated.
- a. In its next IRP, Minnesota Power will continue to evaluate additional transmission system reliability mitigations needed to maintain the option of retiring the Boswell facility entirely, including unit 4, by no later than 2030.
  - b. Any evaluation of early retirement scenarios at Boswell will also include a comprehensive analysis of worker transition and socioeconomic impacts, including projected impacts on the local tax base for the City of Cohasset and Itasca County.
  - c. MP will also specifically evaluate converting Boswell 3 to a synchronous condenser upon retirement in the next IRP.
  - d. In the next IRP, MP will describe work done to date and work yet to be completed, provide a schedule of expected milestones, and estimate the earliest date for completion of the transmission system reliability mitigations.
- (MP, CEO, LIUNA. New – replaces Original DO 22)
6. Require MP to cease coal operations at ~~BEC Unit 3 by December 31, 2029 and~~ BEC Unit 4 by 2035 at the latest. Capacity and energy replacement options including transmission solutions ~~for both units~~ will be evaluated during the next resource plan. MISO long range transmission planning and associated processes will be incorporated.

- a. In its next IRP, Minnesota Power will continue to evaluate additional transmission system reliability mitigations needed to maintain the option of retiring the Boswell facility entirely, including unit 4, by no later than 2030.
  - b. Any evaluation of early retirement scenarios at Boswell will also include a comprehensive analysis of worker transition and socioeconomic impacts, including projected impacts on the local tax base for the City of Cohasset and Itasca County.
  - c. MP will also specifically evaluate converting Boswell 3 to a synchronous condenser upon retirement in the next IRP.
  - d. In the next IRP, MP will describe work done to date and work yet to be completed, provide a schedule of expected milestones, and estimate the earliest date for completion of the transmission system reliability mitigations.
- (CUB. New – modification of 5 above)

7. Require MP to cease coal operations at BEC Unit 3 by December 31, 2029 and BEC Unit 4 by 2035 at the latest. All capacity and energy replacement options, including transmission solutions, for both units will be evaluated during the next resource plan. MISO long range transmission planning and associated processes will be incorporated.
  - a. In its next IRP, Minnesota Power will continue to evaluate additional transmission system reliability mitigations needed to maintain the option of retiring the Boswell facility entirely, including unit 4, by no later than 2030.
  - b. ~~Any evaluation of early~~ All retirement scenarios at Boswell will also include a comprehensive analysis of reliability, customer rate implications, any proposal or Commission decision with respect to NTEC capacity, worker transition, and socioeconomic impacts, including projected impacts on the local tax base for the City of Cohasset and Itasca County.
  - c. MP will also specifically evaluate converting Boswell 3 to a synchronous condenser upon retirement in the next IRP.
  - d. In the next IRP, MP will describe work done to date and work yet to be completed, provide a schedule of expected milestones, and estimate the earliest date for completion of the transmission system reliability mitigations.

(LPI. New – modification of 5 above)

Other Decision Options related to Approval of the IRP

*Staff note: Minnesota Power DO 8 in addition to the Joint Decision Options. The Commission may adopt DO 8 independent of its decisions in DO 1-4 and 5-7*

8. Approve Minnesota Power's plan to work collaboratively with customers to pursue up to 50 MW of long-term demand response by 2030 to address future resource adequacy changes.
- (MP. Original DO 1.c)

*Staff note: Decision Options 9 and 10 are the Department's preferred Decision Options, which would be an alternative to the Joint Decision Options proposed in DO 1-4 and 5-7. CUB supports DO 9a and 10 only, which can be taken as a replacement retirement date for Boswell 3*

9. Require Minnesota Power to:
- Retire BEC 3 in 2025, with the actual date to be adjusted based on feasibility
  - Proceed as if BEC 4 were to be shut down in 2030
  - Begin proceedings to acquire approximately 282 MW of peaking resource that would be built in 2026, following BEC 3 retirement
  - Acquire 200 to 300 MW of wind in the in the 2024 to 2025 time frame
  - Work with MISO to ensure that Tranche 1 LRTP would fully meet all reliability requirements associated with a 2030 BEC 4 retirement; and
  - Begin planning for solar sited at BEC, beginning around the time of the BEC 4 retirement.
- (Department, CUB supports 9a only. *Original DO 2*)
10. Direct MP to re-study the BEC 4 2030 retirement decision and other retirement dates in the next IRP.
- (Department, CUB. *Original DO 11*)

### **Nemadji Trail Energy Center (NTEC)**

*Staff note: Decision Options 11 through 16 relate to NTEC. The Commission may choose one option from DO 11 through 15. DO 16 can be used in combination with DO 13-15.*

- DO 11 is Department preferred*
  - DO 12 is OAG preferred*
  - DO 13 is the new “Joint Decision Option” on NTEC from MP and CEOs.*
  - DO 14 is CUB’s variation on the Joint DO*
  - DO 15 is LPI’s variation on the Joint DO*
  - DO 16 is the OAG’s recommendation if DO 13 through 15 are adopted.*
11. Make no determination regarding NTEC in this proceeding. Require MP to make a filing no later than 60 days following the final court ruling regarding NTEC. At a minimum the filing should include an explanation of MP’s plans regarding NTEC along with a request for any Commission approvals necessary for MP to implement its plans.
- (Department. *Original DO 4*)
12. Remove NTEC from Minnesota Power’s resource plan and rescind the NTEC affiliated-interest agreements.
- (OAG preferred, Fond Du Lac. *Original DO 5*)
13. MP will file amended Affiliated Interest Agreements and updated capacity dedication amounts as part of the next resource plan or sooner, and parties may analyze whether that amount of NTEC capacity is in the public and ratepayer interest.
- (MP, CEO, LIUNA. *New*)
14. MP will file amended Affiliated Interest Agreements and updated capacity dedication amounts ~~within one year as part of the next resource plan or sooner~~, and parties may analyze whether that amount of NTEC capacity is in the public and ratepayer interest.
- (CUB. *New – modification of 11 above*)

15. MP will file amended Affiliated Interest Agreements and updated capacity dedication amounts as part of the next resource plan or sooner, and ~~parties may~~ the Commission will analyze whether that amount of NTEC capacity is in the public and ratepayer interest, either in the next resource plan or in a separate proceeding.  
(LPI. New – modification of 11 above)
16. Deferring consideration of NTEC until MP’s next integrated resource plan or sooner shall not equate to a determination that NTEC, the AIAs, or any NTEC capacity amounts are prudent or in the public interest. Nor shall deferral provide a basis for MP to argue that it relied on the deferral to its detriment.  
(OAG, if 13 is adopted. New)

### Hibbard

*Staff Note: Minnesota Power’s preferred decision option on Hibbard is Decision Option 35b, which is part of a broader option on stakeholder involvement going forward. CEOs support 17 or 19.*

17. Require Minnesota Power to retire the Hibbard plant in 2023.  
(CEO, supports 17 OR 19. *Original DO 3b*)
18. In its next IRP, Minnesota Power shall include a societal cost-benefit analysis of the M.L. Hibbard Renewable Energy Center to analyze whether continuing the facility would provide an overall net benefit to Minnesota Power customers. The analysis shall consider system reliability, customer costs, environmental impacts, and host community impacts.  
(Staff, Department. *Original DO 28*)
19. By June 1, Minnesota Power shall include file in a new docket an ~~societal cost-benefit~~ analysis of the M.L. Hibbard Renewable Energy Center to analyze whether continuing to operate the facility would provide an overall ~~net public interest~~ benefit ~~to Minnesota Power customers~~. The analysis shall consider system reliability issues and mitigations, customer costs, generation replacement options, environmental impacts including waste wood management issues, and host community health and socioeconomic impacts including racial and income demographic analysis of who is experiencing these impacts. If the new docket is not completed by MP’s next resource plan filing, that docket can be incorporated with MP’s next resource plan docket. The Commission will direct the Executive Secretary to open the docket and file schedules for comment periods as appropriate.  
(CEO, supports 17 OR 19; CUB, OAG. *New - modification of 18 above*)

## Resource Acquisition

20. Require MP to use a bidding process for MP's future resource acquisitions as follows;

MP shall:

- a. use a bidding process for supply-side acquisitions of 100 MW or more lasting longer than five years;
- b. ensure that the RFP is consistent with the Commission's then-most-recent IRP order and direction regarding size, type, and timing unless changed circumstances dictate otherwise;
- c. provide the Department and other stakeholders with notice of RFP issuances;
- d. notify the Department and other stakeholders of material deviations from initial timelines;
- e. update the Commission, the Department, and other stakeholders regarding changes in the timing or need that occur between IRP proceedings;
- f. where MP or an affiliate proposes a project, engage an independent evaluator to oversee the bid process and provide a report for the Commission;
- g. request that the independent evaluator, if engaged, specifically address the impact of material delays or changes of circumstances on the bid process; and
- h. any RFP issued by MP must include the option for both PPA and BOT proposals unless the Company can demonstrate why either a PPA or BOT proposal is not feasible
- i. cap any [Right of First Offer] ROFO offer made by MP at net book value; and
- j. ensure that any RFP documents for peaking resources issued are technology neutral.

(Department, OAG, MP with the exception of 20i. *Original DO 7*)

21. Condition Minnesota Power's implementation of resource acquisitions upon a finding that it is pursuing cost-effective options for ratepayers at the time the resources are acquired.

(LPI, Department, OAG. *Original DO 8*)

## Issues for the Next IRP

22. Require Minnesota Power to file its next IRP by November 1, 2024.

(Staff. *Original DO 9*)

23. Require Minnesota Power to file its next IRP by ~~November 1, 2024~~ March 1, 2025.

(MP. *New, modification of 22 above*)

24. In developing its next resource plan, Minnesota Power shall consult with stakeholders, including but not limited to parties to the current proceeding, to develop analysis that shall inform its next IRP on the following topics:

- a. Implications of the Inflation Reduction Act on renewable energy projects,
- b. Efforts to access applicable federal Infrastructure Investment and Jobs Act funding,
- c. MISO's Long Range Transmission Planning process,



- d. MISO’s Seasonal Adequacy Construct changes,
- e. An update on regional economic development activities in support of host communities
- f. [topics identified by the Commission – for examples see list in “Staff Discussion – Next IRP”]

(Staff, MP - *New subparts a-e. Original DO 30*)

## Other Topic Areas

### Modeling DER solar in future IRPs

*Staff note: The Commission can choose from 3 options for modeling DERs in future IRPs, or the Commission can choose to take no action.*

- *DO 25 is the Staff proposal based off the original CEO suggestion*
- *DO 26 is CEO’s updated recommendation from its Nov 7 letter, and is a modification of DO 25. CUB supports DO 29 without the CEO addition of “if feasible”*
- *DO 27 is Minnesota Power’s alternative to 25 and 26*

25. Require Minnesota Power to track Xcel’s ongoing stakeholder work to develop a modeling construct that enables Xcel, as part of its next resource plan, to model solar-powered generators connected to Xcel’s distribution grid as a resource. In its next IRP Minnesota Power shall provide a timeline to incorporate a similar modeling construct that addresses the following factors after consultation with stakeholders:
  - a. using a “bundled” approach as is used to model energy efficiency and demand response;
  - b. the costs borne by the utility and the costs borne by the customer;
  - c. cost effectiveness tests; and
  - d. other topics as identified by stakeholders.

(Staff. *Original DO 16*)

26. Require Minnesota Power to track Xcel’s ongoing stakeholder work to develop a modeling construct that enables Xcel, as part of its next resource plan, to model solar-powered generators connected to Xcel’s distribution grid as a resource. In its next IRP, Minnesota Power shall ~~provide a timeline to~~ incorporate, if feasible, a similar modeling construct that addresses the following factors after consultation with stakeholders:
  - a. using a “bundled” approach as is used to model energy efficiency and demand response;
  - b. the costs borne by the utility and the costs borne by the customer;
  - c. cost effectiveness tests; and
  - d. other topics as identified by stakeholders.

(CEO, CUB support with striking “if feasible”. *New - modification of 26 above*)

27. In developing the modeling analysis to be used in its next resource plan, Minnesota Power shall consult with stakeholders, including but not limited to the Department of Commerce, Office of the Attorney General, Large Power Intervenors and the Clean Energy Organizations, regarding the Company’s modeling inputs and parameters.

- a. In its next resource plan, Minnesota Power will include a summary of the modeling stakeholder group discussions, including potential modeling constraints and how Minnesota Power could consider modeling solar-powered generators connected to the Company's distribution grid as a resource.

(MP. New - alternative to 25 or 26)

Alignment of IDP and IRP

Staff note: the Commission may choose DO 31, DO 32, or neither

- DO 28 is the CEO/CUB preferred option
- DO 29 is the staff modification of CEO/CUB, which is supported by MP

28. Require Minnesota Power to take steps to better align distribution and resource planning, including:

- a. set the forecasts for distributed energy resources consistently in its resource plan and its Integrated Distribution Plan;
- b. conduct advanced forecasting to better project the levels of distributed energy resource deployment at a feeder level;
- c. proactively plan investments in hosting capacity and other necessary system capacity to allow distributed generation and electric vehicle additions consistent with the forecast for distributed energy resources;
- d. improve non-wires alternatives analysis, including market solicitations for deferral opportunities to make sure Minnesota Power can take advantage of distributed energy resources to address discrete distribution system costs; and
- e. plan for aggregated distributed energy resources to provide system value including energy/capacity during peak hours.

(CEO, CUB. Original DO 17)

29. Require Minnesota Power in its next IDP to provide information on how it could implement the following steps to better align distribution and resource planning:

- a. set the forecasts for distributed energy resources consistently in its resource plan and its Integrated Distribution Plan;
- b. conduct advanced forecasting to better project the levels of distributed energy resource deployment at a feeder level;
- c. proactively plan investments in hosting capacity and other necessary system capacity to allow distributed generation and electric vehicle additions consistent with the forecast for distributed energy resources;
- d. improve non-wires alternatives analysis, including market solicitations for deferral opportunities to make sure Minnesota Power can take advantage of distributed energy resources to address discrete distribution system costs; and
- e. plan for aggregated distributed energy resources to provide system value including energy/capacity during peak hours.

(Staff modification of 28 above, MP. Original DO 18)

Other topics: clean energy, stakeholder outreach, public health analysis, carbon reduction, and equity

*Staff note: Decision Options 30 through 34 relate to a variety of topics proposed by CUB and CEOs. Decision Options 35 and 36 are Minnesota Power’s alternatives to those recommendations.*

30. Require Minnesota Power to work with stakeholders to include an analysis in the next IRP that identifies the near-term steps needed to ensure Minnesota Power meets its customers’ needs in a fashion compatible with 1.5°C pathways.  
(CEO. *Original DO 14*)
31. Require Minnesota Power to account for local clean energy goals, in aggregate, in forecasting and modeling. In particular, the plan should include consideration of local community generation goals for distributed generation in its next IRP.  
(CEO, CUB. *Original DO 19*)
32. Require Minnesota Power’s next IRP to include an analysis of the public health impacts, over the 15-year planning period, of its current generation fleet, its proposed plan, and other resource scenarios studied. The public health analysis should at minimum evaluate and quantify the health costs associated with fine particulate matter from coal and biomass power plants, including a demographic analysis to identify if any persons or communities experience a disproportionate amount of the health impacts.  
(CEO, CUB, OAG. *Original DO 20*)
33. Require Minnesota Power to, prior to the next IRP, conduct community outreach and establish a stakeholder group to:
  - a. provide input on the public health analysis for the next IRP, including the methodology, results, and implications for Minnesota Power’s resource plan;
  - b. inform the design of electricity services and programs that improve equitable electricity delivery, improve customer access to energy efficiency and load-shaping programs, and improve customer access to DG and renewable energy. These services and programs should particularly focus on reducing disparities in energy burden, ensuring equitable access to low-income residents, and ensuring equitable access to Black, indigenous, and communities of color that have disproportionately borne costs of unjust and inequitable energy decisions;Order Minnesota Power, in its next IRP docket, and in a separate docket to be established by the Executive Secretary, to file details describing stakeholder outreach and progress on the above requirements by January 1, 2024, and annually thereafter.  
(CEO, CUB. *Original DO 21*)
34. Require Minnesota Power in its next IRP to address equity considerations, including the equitable distribution of energy benefits and reduction of burdens to vulnerable populations and highly impacted communities.  
(CUB. *New*)

35. Require Minnesota Power to work with stakeholders, including but not limited to parties to the current proceeding, to include a stakeholder report in the next IRP.
- MP will work to intentionally include stakeholders from groups historically not present in these regulatory processes, like low-income customers and customers from BIPOC (black, indigenous, and communities of color) communities.
  - Stakeholders will provide input on a societal cost benefit analysis of Boswell Energy Center Unit 4 and Hibbard Renewable Energy Center, considering impacts on host communities, economics, health, system reliability, the environment, and customer costs.
  - An analysis of the near-term steps needed to ensure Minnesota Power meets clean energy goals set in Minnesota state statute.

(MP. New - alternative to 30, 31, 32, and 33a-b)

36. In any proposal for a new customer programs or services that does not have an existing evaluation framework, MP will include an evaluation of whether the customer program or service meets the following criteria:

- Provides significant utility system benefits;
- Is consistent with approved resource plans, approved natural gas distribution infrastructure or pipeline safety plans, triennial conservation plans, and existing Commission orders;
- Reduces carbon or other pollutant emissions in the power sector or across economic sectors;
- Increases access to conservation, electrification, and clean energy resources for Minnesotans;
- Uses woman, veteran, or minority owned businesses as much as possible.
- Considers equity and equitable access in program design.

(MP. New - alternative to 30, 31, 32, and 33a-b)

### Non-Wires Alternatives

*Staff note: the Commission may choose from 37, 38, or take no action.*

- DO 37 is CUB's suggestion, slightly modified from its original proposal.
- DO 38 is MP's modification of CUB's proposal.

37. Require Minnesota Power to file the results from its consultant led non-wires alternative study in the ~~next-current IRP and~~ IDP dockets. Require Minnesota Power to begin integrating NWS into all the company's planning practices, including its next IRP and IDP, with a focus on how NWS can help ameliorate the localized reliability needs of northern Minnesota when BEC 3 and 4 eventually retire.

(CUB, as modified. *Original DO 23*)

38. Require Minnesota Power to file the results from its consultant led non-wires alternative study in the ~~current-next IRP and~~ IDP dockets. ~~Require-In next IDP~~ Minnesota Power ~~to~~ will begin a discussion on how to integrate NWS into all the company's planning practices, including its next IRP and IDP, ~~with a focus on how NWS can help~~

~~ameliorate the localized reliability needs of northern Minnesota when BEC 3 and 4 eventually retire.~~

(MP. New - modification of 37 above)

#### Boswell Site Remediation

39. Delegate authority to the Executive Secretary of the Commission to open a new docket on site development and remediation plans for the Boswell site.

(Department, Cohasset, CEO. *Original DO 25*)

40. Minnesota Power shall conduct stakeholder meetings regarding the site with interested parties including the City of Cohasset; adjacent cities and townships including the City of Grand Rapids, Itasca County; The Minnesota Department of Commerce, the Minnesota Department of Natural Resources, the Minnesota Pollution Control Agency, the Center for Energy and Environment, the Minnesota Energy Transition Office, and labor unions. By January 1 of the year following approval of this plan, Minnesota Power shall file in the new docket details describing updates on the site and the stakeholder outreach and meetings.

(Department, Cohasset CEO. *Original DO 26*)

41. By December 31, 2024, or in its next resource plan if earlier—and annually thereafter—Minnesota Power shall submit to the Commission and to the City of Cohasset a detailed report describing the company’s plans for disposition of the Boswell site, equipment, and buffer property. The report shall include at least the following items:

- a. To the extent possible, a detailed description of the timeline, estimated costs, and steps necessary to remediate pollution at the Boswell site.
- b. A section detailing how the company is working to ensure that plans for site remediation, economic development, or future development and maintenance of power generation, transmission, or distribution infrastructure are consistent with the community’s long-range planning and vision.
- c. A description of any ongoing efforts by the company to evaluate future uses for the plant site, any buffer property owned by the company, or any adjacent property, including a description of how the company is involving interested stakeholders in those efforts.
- d. An update to the Commission on the status of efforts to support the city’s and region’s economic development efforts, including—to the extent possible—specific projects and investments the company is assisting the City and region in attracting.
- e. A description of the company’s efforts to work with local governments and
- f. Any other items the Commission or the company see fit to include

(Department, Cohasset, CEO. *Original DO 27*)

#### Compliance Filings

*Staff note: The Commission may select DO 42 or Decision Option 43. DO 44 and DO 45 can be adopted independently of other options selected in this section.*

42. Within 180 days of the EPA's issuance of its final order, require Minnesota Power to submit a compliance filing that presents the utility's understanding of EPA's final Federal Implementation Plan (FIP) and an action plan in response to the final FIP.  
(Department, OAG. *Original DO 24*)
43. Within 180 days of the EPA's issuance of its final order, after appeals, require Minnesota Power to submit a compliance filing that presents the utility's understanding of the EPA's final Federal Implementation Plan (FIP). ~~and an action plan in response to the final FIP.~~  
(MP. *New – modification of 42 above*)
44. MP shall make a compliance filing updating the Commission of the Company's final capacity position at least 30 days after MISO publishes the accredited capacity values.  
(Staff, Department, MP, CUB. *Original DO 29*)
45. By June 1, 2023, Minnesota Power shall submit an informational filing identifying the provisions of the Infrastructure Investment and Jobs Act and Inflation Reduction Act that are relevant to the utility and its customers and detailing the Company's plan to maximize ratepayer benefits. The filing shall include a discussion of whether and how the Energy Infrastructure Reinvestment Program could help deal with stranded costs from and/or support accelerated retirement of the Company's remaining coal plants.  
(CUB. *New*)