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Sent: Monday, August 29, 2022 2:10 PM
To: Staff, CAO (PUC) <consumer.puc@state.mn.us>
Subject: Public Comments for Docket Number: E015/RP-21-33

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Honor the Earth requests that the Commission to approve the Clean Energy Organizations' preferred energy resource plan in Docket Number: E015/RP-21-33 by ordering Minnesota Power to:

Build out more renewables

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- This includes 600 MW of solar and 100 MW of wind by 2030; 300 MW of wind and 243 MW of battery storage in response to the Boswell 3 retirement; and a solar hybrid project of 100 MW of solar with 25 MW paired battery storage.
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- The future energy needs of the region can be reliably met by investing in more renewable resources,
- such as solar, battery storage and wind, without adding to Minnesota Power's fossil

fuel infrastructure.

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- The Clean Energy Organizations used the same modeling tool as Minnesota Power used and found that
- ramping up investments in renewable energy has equivalent reliability, similar up-front
- costs, but is much less financially risky than building new fossil fuel power plants, and does not harm people's health.
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Support community and customer owned solar

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- Minnesota Power customers deserve the option to put solar on their rooftop or subscribe in a community
- solar garden, but there is more interest than opportunity. Investments in "distributed generation," or smaller-scale local energy generation can help to create jobs, reduce need for fossil fuels and can help customers save on their electricity bill. Minnesota
- Power should:
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 - Reinvest in solar rebates for rooftop solar;
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 - Create new, public facing process for community solar proposals that guarantees rate for electricity
 - produced;
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 - Expand their low-income solar program;
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 - Incentivize solar with energy storage in rebates and community solar;
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- Minnesota Power's community solar program is full despite customer interest and its

rooftop solar

- incentive can't keep up with demand.
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Prioritize equitable access to benefits of clean energy

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- As Minnesota Power invests in more clean energy, they have the opportunity and responsibility to
- ensure the benefits of clean energy are shared equitably, prioritizing communities most impacted by fossil fuel pollution and communities impacted by transition away from fossil fuels. Minnesota Power should:
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 - Work with low-income customers, environmental justice communities, and plant host communities to
 - develop programs that meet community needs and expand access to energy efficiency, community and rooftop solar, and workforce training.
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 - Set concrete goals for workforce diversity and local hiring for clean energy development.
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Reject the NTEC fossil gas plant

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- The fossil fuel gas plant is not needed to meet future energy demands of MN Power customers.
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- Building a new fossil fuel gas plant with a 40-year lifespan is dangerous for the climate and runs counter to everything climate
- scientists - specifically the IPCC - say we need to be do to curb the worst impacts of the climate crisis
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 - IPCC report makes clear that we need to be phasing out all fossil fuel

- infrastructure, not adding
- to it
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- Leading research finds that CO2 emission estimates for the plant only account for half of the GHG
- impacts NTEC would actually have over the next 2 decades due to upstream methane emissions associated with gas production, processing, and transmission. NTEC is estimated to emit 2.24 million tons of CO2 every year, which is equivalent to about 483,000 gasoline
- powered vehicles driven for one year.
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- Building a new fossil fuel gas plant is inconsistent with both Minnesota and the federal government's
- aims to transition to a 100 percent carbon-free power grid by 2035 and 2040.
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- Building a new gas plant with a 40-year-old lifespan that we know will be obsolete well before
- that is a bad investment of ratepayer dollars
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Retire the Hibbard plant by 2023

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- According to the PSE health impact study, the utility's coal and biomass power plant in West Duluth
- causes costly health impacts due to its location in the middle of an urban center and the harmful array of pollution it emits.
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- The nearby population exposed to its pollution are disproportionately low-income, with higher percentages
- of Black and native residents.
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- In 2021 alone, the report found that Hibbard caused 6.4 mortalities and \$70

million in health impacts.

- The health impacts are predominantly respiratory symptoms, caused by dangerous particulate matter, hospital admissions, heart attacks and death.
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- If the PUC approves Minnesota Power's proposed energy resource plan for 2021-2035, the Hibbard
- biomass facility would cause 38.9 deaths as well as a total of \$437 million in health impacts.
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- Hibbard isn't necessary to reliably meet future energy needs. Minnesota Power should not operate
- a plant it doesn't need when it's impacting people's health.
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Retire the Boswell 3 coal unit by 2030 and plan for the early retirement of Boswell 4

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- Minnesota Power has made significant strides toward reducing its dependence on coal over the last decade, but they should go
- further not just because it's necessary to combat the climate crisis, but also because it's cheaper for ratepayers and better for public health.
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- The PUC should order the Minnesota Power to plan for the retirement of the Boswell plant by 2030 to ensure we meet the greenhouse
- gas reduction targets set by climate scientists that are necessary to avoid the worst impacts of the climate crisis.
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Support worker and community transition

Retiring the Boswell coal plant will have a significant impact on the City of Cohasset and surrounding communities. Minnesota Power should:

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- Support community transition planning & advocate for state and federal support, including policy
- that supports securitization;

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- Develop worker transition plan with labor unions and community leaders;
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- Invest in clean energy in plant communities, including expanding access to energy efficiency, rooftop
- and community solar projects, as supported by community.
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Conduct health impact studies as a routine practice in the fulfillment of its duty to protect the public interest within utilities' IRP processes.

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- Considering health and equity studies in utility resource decisions should be a best practice.
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 - The PUC is charged with making its determination according to what is in the best interest of the
 - public, and that extends beyond financial considerations for ratepayers. Health and equity should also be included in that analysis.
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 - The PSE health impact study illustrates the serious, long-lasting and disproportionate health impacts
 - caused by burning fossil fuels to power our homes and lives.
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