

July 25, 2025

Mike Bull
Interim Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: Comments of the Minnesota Department of Commerce
Docket No. ET2/RP-22-75

Dear Mr. Bull:

Attached are the comments of the Minnesota Department of Commerce (Department) in the following matter:

In the Matter of Great River Energy's 2023–2037 Integrated Resource Plan.

The Petition was filed by Great River Energy on June 16th, 2025.

The Department recommends **approval with modifications** and is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ Dr. SYDNIE LIEB
Assistant Commissioner of Regulatory Analysis

SR/ad
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce

Docket No. ET2/RP-22-75

I. INTRODUCTION

Great River Energy (GRE) provides electricity to approximately 1.7 million people through its 27 member-owner cooperatives and customers. Through the member-owners, GRE serves two-thirds of Minnesota geographically.

All utilities with the capability of generating 100,000 kilowatts or more of electric power and serving, either directly or indirectly, the needs of 10,000 retail customers in Minnesota must file an integrated resource plan (IRP).¹ IRPs are filed on a schedule determined by the Minnesota Public Utilities Commission (Commission). GRE qualifies to file IRPs and is currently scheduled to file an IRP on April 1, 2026.

II. PROCEDURAL BACKGROUND

March 31, 2023	GRE filed an IRP for the years 2023-2037, including GRE's preferred plan for meeting its customers' needs throughout the period. ²
June 11, 2024	The Minnesota Public Utilities Commission (Commission) issued an order accepting GRE's IRP and establishing a due date of April 1, 2026 for GRE's next IRP. ³
June 16, 2025	GRE filed a petition requesting a one-year extension for the filing of GRE's next IRP (to April 1, 2027). ⁴

III. DEPARTMENT ANALYSIS

A. GRE'S EXTENSION REQUEST

A.1. Reasons for the Extension

The Extension Petition provides several reasons for the requested one-year extension to the IRP filing date:

¹ [Minn. Stat. § 216B.2422, subd. 1.](#)

² *In the Matter of Great River Energy's 2023–2037 Integrated Resource Plan*, Petition, March 31, 2023, Docket No. ET2/RP-22-75, (eDockets), [20233-194396-01](#). (Hereinafter, "IRP Petition").

³ *In the Matter of Great River Energy's 2023–2037 Integrated Resource Plan*, Order Accepting 2023-2027 Resource Plan and Setting Future Filing Requirements, June 11, 2024, Docket No. ET2/RP-22-75, (eDockets), [20246-207588-01](#). (Hereinafter, "Order").

⁴ *In the Matter of Great River Energy's 2023–2037 Integrated Resource Plan*, Petition, June 16, 2025, Docket No. ET2/RP-22-75, (eDockets), [20256-220017-01](#). (Hereinafter, "Extension Petition").

1. Federal Policy Uncertainty: uncertainty around incentives such as the production tax credit and investment tax credit along with trade policy developments, particularly new or expanded tariffs have delayed GRE's ability to receive accurate resource cost information.
2. Load Growth Uncertainty: GRE is currently assessing several large load interconnection requests, primarily from data centers. Additional time will allow GRE to refine the load forecasts and develop sensitivities around the preferred plan that reflect a more accurate range of outcomes.
3. State Policy Uncertainty: The potential for new statutory obligations or permitting frameworks in the 2025 legislative session adds another layer of uncertainty that will materially influence GRE's long-term planning and the feasibility of certain large load interconnection requests.
4. Compliance with the Carbon Free Standard: Clarity is needed on how to model compliance obligations and whether that modeling involves annual or hourly renewable energy credit matching, or other decarbonization metrics.
5. Empowering Rural America (New ERA) Program Considerations: GRE is monitoring the implementation of the U.S. Department of Energy's New ERA program and its potential implications for resource costs, funding availability, and carbon-free technology options.⁵

A.2. GRE's Resource Needs

The IRP Petition first showed a need for new, uncontracted, resources in the 2030-2032 timeframe as follows:

- 200 MW of storage in 2030;
- 200 MW of solar in 2031; and
- 400 MW of wind in 2032.⁶

These additions appear to be added to replace a 350 MW reduction in GRE's power purchase agreement (PPA) with Rainbow Energy Center, LLC in 2031.

A.3. Department Review

Since the capacity needs from the last IRP appear to be driven by an expiring PPA and GRE is now concerned about rapid, near-term load growth, GRE's capacity and energy needs are unlikely to be later than estimated in the last IRP. Therefore, it is important that GRE's next IRP have accurate inputs—so GRE can judge what size, type, and timing of resources are needed, and that GRE's next IRP be completed such that GRE can use the IRP and the Commission's advice to inform acquisition of new resources in the early 2030s.

⁵ Extension Petition at 1-2.

⁶ IRP Petition at 10.

In weighing the tradeoff between speed and accuracy, GRE opted for a one-year extension request. An April 1, 2027 IRP filing, assuming no further time extensions, would likely result in a Commission decision in late 2027 or early 2028. That timing would leave GRE with two or three years to place in-service permanent resources or acquire short-term PPAs to cover GRE's load until permanent resources can be placed in-service.

The Department agrees with GRE that, while there is always uncertainty in resource planning, the current environment contains greater uncertainty than normal.⁷ In addition, the requested extension should leave GRE with sufficient time to acquire new permanent resources or short term PPAs as a bridge to the new resources.

The final consideration is the schedule for other IRPs. Table 1 below shows the schedule for IRP filings at this time. Delaying GRE's IRP by a full year would result in GRE filing its IRP 3 weeks before Northern States Power Company d/b/a Xcel Energy's IRP is due.

Table 1: IRP Filing Schedule⁸

Utility	Next IRP Due
SMPMPA	on-going
Minn. Power	on-going
MMPA	01-Aug-25
Minnkota	01-Dec-25
Great River	01-Apr-26
Otter Tail	15-May-26
Missouri River	01-Jul-26
Xcel Energy	21-Apr-27

Due to the timing of Xcel Energy's IRP, the Department considered as an alternative either a 9-month (to January 1, 2027) or 15-month extension (to July 1, 2027). Given the current information, it appears that either alternative would work. Further, either alternative would enable the Department to better use its planning staff resources for IRPs other than GRE's proposal. Considering the tradeoff between the timing of GRE's capacity needs, which would be updated via the new IRP, and the timing of

⁷ This conclusion does not mean the Department agrees with all of the uncertainties identified by GRE—only that some of the uncertainties GRE listed are unknown at this time and are potentially significant.

⁸ Table 1 excludes Alliant Energy, which would file an IRP on February 1, 2026 only if the agreement under which it sells electric power to Southern Minnesota Energy Corporation is renewed. Table 1 also excludes Basin Electric Power Cooperative, which intends to switch from filing optional IRPs to a regular IRPs; see Docket No. ET6125/RP-25-266 for details.

potential resolution to the uncertainties, the Department recommends that the Commission approve a 15-month extension to the filing date for GRE's next IRP.

IV. DEPARTMENT RECOMMENDATIONS

Based on analysis of the Extension Petition and GRE's most recent IRP, the Department has prepared recommendations, which are provided below. The recommendations correspond to the subheadings of Section III above.

A. GRE'S EXTENSION REQUEST

- A.3. The Department recommends that the Commission approve a 15-month extension to the filing date for GRE's next IRP.

CERTIFICATE OF SERVICE

I, Nicole Westling, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

Minnesota Department of Commerce
Comments

Docket No. ET2/RP-22-75

Dated this **25th** day of **July 2025**

/s/Nicole Westling

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
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4	Ray	Auginaush, Sr.	ray.auginaush@whiteearth-nsn.gov	White Earth Nation		White Earth Tribal Headquarters 35500 Eagle View Road Ogema MN, 56569 United States	Electronic Service		No	22-75Official
5	Mark	Bakk	mbakk@lcp.coop	Lake Country Power		26039 Bear Ridge Drive Cohasset MN, 55721 United States	Electronic Service		No	22-75Official
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12	Peter	Boney	pboney@boisforte-nsn.gov	Bois Forte Band of Chippewa		Bois Forte Tribal Government 5344 Lakeshore Drive Nett Lake MN, 55772 United States	Electronic Service		No	22-75Official
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101	Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND		81 E Little Canada Road St. Paul MN, 55117 United States	Electronic Service		No	22-75Official
102	Robert	Prescott	bob.prescott@lowersioux.com	Lower Sioux Indian Community		39527 Highway 1 Morton MN, 56270 United States	Electronic Service		No	22-75Official
103	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	22-75Official
104	Stephan	Roos	stephan.roos@state.mn.us		Minnesota Department of Agriculture	625 Robert St N Saint Paul MN, 55155-2538 United States	Electronic Service		No	22-75Official
105	Alan	Roy	alan.roy@whiteearth-nsn.gov	White Earth Nation		White Earth Tribal Headquarters 35500 Eagle View Road Ogema MN, 56569 United States	Electronic Service		No	22-75Official
106	Bill	Rudnicki	bill.rudnicki@shakopeedakota.org	Shakopee Mdewakanton Sioux Community		Shakopee Mdewakanton Sioux Community 2330 Sioux Trail NW Prior Lake MN, 55372 United States	Electronic Service		No	22-75Official
107	Nathaniel	Runke	nrunke@local49.org			611 28th St. NW Rochester MN, 55901 United States	Electronic Service		No	22-75Official
108	Zachary	Ruzycki	zruzycki@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369 United States	Electronic Service		No	22-75Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
109	Miranda	Sam	miranda.sam@lowersioux.com	Lower Sioux Indian Community		39527 Reservation Highway 1 PO Box 308 Morton MN, 56270 United States	Electronic Service		No	22-75Official
110	Adam	Savariego	adams@uppersiouxcommunity-nsn.gov	Upper Sioux Community		5722 Travers Lane PO Box 147 Granite Falls MN, 56241 United States	Electronic Service		No	22-75Official
111	Ronald J.	Schwartau	rschwartau@noblesce.com	Nobles Electric Cooperative		22636 U.S. Hwy. 59 Worthington MN, 56187 United States	Electronic Service		No	22-75Official
112	Jessie	Seim	jessie.seim@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN, 55089 United States	Electronic Service		No	22-75Official
113	Darrell	Seki, Sr.	dseki@redlakenation.org			15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	22-75Official
114	Joel	Smith	jsmith@mnchippewatribe.org	Minnesota Chippewa Tribe		PO Box 217 Cass Lake MN, 56633 United States	Electronic Service		No	22-75Official
115	Nizhoni	Smith	nizhoni.smith@lowersioux.com	Lower Sioux Indian Community		PO Box 308 39527 Reservation Highway 1 Morton MN, 56270 United States	Electronic Service		No	22-75Official
116	Roger	Smith, Sr.	rogermsmithsr@fdlrez.com			1720 Big Lake Road Cloquet MN, 55720 United States	Electronic Service		No	22-75Official
117	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	22-75Official
118	Marie	Spry	mariespry@grandportage.com			PO Box 428 Grand Portage MN, 55605 United States	Electronic Service		No	22-75Official
119	LeRoy	Staples Fairbanks III	leroy.fairbanks@llojbwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	22-75Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
120	Mark	Strohfus	mstrohfus@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	22-75Official
121	Samuel	Strong	sam.strong@redlakenation.org	Red Lake Nation		15484 Migizi Drive Red Lake MN, 56671 United States	Electronic Service		No	22-75Official
122	Timothy	Sullivan	tsullivan@whe.org	Wright Hennepin Coop. Electric Assn.		6800 Electric Drive PO Box 330 Rockford MN, 55373 United States	Electronic Service		No	22-75Official
123	David	Sunderman	daves@benco.org	BENCO (DUPLICATE)		PO Box 8 Mankato MN, 56002-0008 United States	Electronic Service		No	22-75Official
124	Camille	Tanhoff	kamip@uppersiouxcommunity-nsn.gov	Upper Sioux Community		5722 Travers Lane PO BOX 147 Granite Falls MN, 56241 United States	Electronic Service		No	22-75Official
125	Tim	Thompson	tthompson@lrec.coop	Lake Region Electric Cooperative		PO Box 643 1401 South Broadway Pelican Rapids MN, 56572 United States	Electronic Service		No	22-75Official
126	Geoffrey	Tolley	geoff.tolley@gmail.com			855 Stanley Road Two Harbors MN, 55616-1176 United States	Electronic Service		No	22-75Official
127	Caralyn	Trutna	carrie@uppersiouxcommunity-nsn.gov	Upper Sioux Community		Upper Sioux Community P.O. Box 147 Granite Falls MN, 55372 United States	Electronic Service		No	22-75Official
128	Jackie	Van Norman	jvannorman@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	22-75Official
129	Sam	Villella	sdvillella@gmail.com			10534 Alamo Street NE Blaine MN, 55449 United States	Electronic Service		No	22-75Official
130	Trent	Waite	twaite@grenergy.com			null null, null United States	Electronic Service		No	22-75Official
131	Heather	Westra	heather.westra@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Rd Welch MN,	Electronic Service		No	22-75Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						55089 United States				
132	Steve	White	steve.white@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	22-75Official
133	Cody	Whitebear	cody.whitebear@piic.org	Prairie Island Indian Community		5636 Sturgeon Lake Road Welch MN, 55089 United States	Electronic Service		No	22-75Official
134	John	Williams	jwilliams@greenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	22-75Official
135	Virgil	Wind	virgil.wind@millelacsband.com	Mille Lacs Band of Ojibwe		43408 Oodena Drive Onamia MN, 56359 United States	Electronic Service		No	22-75Official
136	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	22-75Official
137	Laurie	York	laurie.york@whiteearth-nsn.gov	White Earth Reservation Business Committee		PO Box 418 White Earth MN, 56591 United States	Electronic Service		No	22-75Official