

August 20, 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. ET6133/RP-25-302

Dear Mr. Bull:

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

*In the Matter of Minnesota Municipal Power Agency's Application for Approval of its 2025-2039 Integrated Resource Plan.*

The Petition was filed by Minnesota Municipal Power Agency on July 31, 2025.

The Department recommends that the Agency file additional information and is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

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

TW/SR/ar  
Attachment



## Before the Minnesota Public Utilities Commission

### Comments of the Minnesota Department of Commerce

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Docket No. ET6133/RP-25-302

#### I. INTRODUCTION

Minnesota Municipal Power Agency (MMPA or the Agency) is a municipal joint action agency serving 12 municipal utilities in Minnesota. The Agency filed an integrated resource plan (IRP) that demonstrates how MMPA will provide for the capacity and energy needs of its municipal utility members for the period 2025 through 2039.

The Minnesota Department of Commerce (Department) reviewed MMPA's Petition for completeness, pursuant to Minnesota Statutes, Minnesota Rules, and various orders issued by the Minnesota Public Utilities Commission (Commission) as documented by MMPA in Appendix D of the Petition. Based on that review the Department notes certain items were not complete. Those items are discussed below.

#### II. PROCEDURAL BACKGROUND

July 31, 2025

MMPA filed the Petition which requests the Commission approve the Agency's 2025-2039 IRP.

#### III. DEPARTMENT COMPLETENESS REVIEW

A. *MINN. R. 7843.0400, SUBP. 3(A)*

Minn. R. 7843.0400, subp. 3(a) states in part:

When a utility's existing resources are inadequate to meet the projected level of service needs, the supporting information must contain a complete list of resource options considered for addition to the existing resources. At a minimum, the list must include new generating facilities of various types and sizes and with various fuel types, cogeneration, new transmission facilities of various types and sizes, upgrading of existing generation and transmission equipment, life extensions of existing generation and transmission equipment, load-control equipment, utility-sponsored conservation programs, purchases from nonutilities, and purchases from other utilities.

The Department notes that the rule requires utilities to explicitly include cogeneration, new transmission facilities of various types and sizes, and load-control equipment in the list of resource options considered when existing resources are inadequate. While the Petition evaluates several resource alternatives to meet capacity requirements and carbon-free energy requirements, it does not explicitly assess cogeneration as a resource option or address new transmission facilities or load-control equipment. Regarding new transmission facilities, the Department recognizes that the Agency does not own, or expect to own during the forecast period, any transmission lines above 200 KVA, as noted in its advance forecast (Appendix B).

The Department recommends that MMPA supplement the record with assessments of cogeneration, new transmission facilities, and load-control equipment or a discussion of why these resources were not considered, or that MMPA indicate where these resources are already addressed in the IRP if applicable.

*B. MINN. R. 7843.0400, SUBP. 4*

Minn. R. 7843.0400, subp. 4 states:

A utility shall include in its resource plan filing a nontechnical summary, not exceeding 25 pages in length and describing the utility's resource needs, the resource plan created by the utility to meet those needs, the process and analytical techniques used to create the plan, activities required over the next five years to implement the plan, and the likely effect of plan implementation on electric rates and bills.

While the Petition includes a nontechnical summary (Section 1), which describes the Agency's resources needs and resource plan, it does not include in this nontechnical summary a description of the analytical techniques used to create the plan.

The Department recommends that MMPA supplement the record with a nontechnical summary of the demand projection methodology used to identify resource needs and the total cost estimation used to evaluate potential capacity resources.

**IV. DEPARTMENT RECOMMENDATIONS**

Based on analysis of the Petition and the information in the record, the Department has prepared recommendations, which are provided below. The recommendations correspond to the subheadings of Section III above.

A. *MINN. R. 7843.0400, SUBP. 3(A)*

The Department recommends that MMPA supplement the record with an assessment of cogeneration, new transmission facilities, and load-control equipment or a discussion of why these resources were not considered, or that MMPA indicate where these resources are already addressed in the IRP if applicable.

B. *MINN. R. 7843.0400, SUBP. 4*

The Department recommends that MMPA supplement the record with a nontechnical summary of the demand projection methodology used to identify resource needs and the total cost estimation used to evaluate potential capacity resources.

## **CERTIFICATE OF SERVICE**

I, Sharon Ferguson, 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. ET6133/RP-25-302**

Dated this **20<sup>th</sup>** day of **August 2025**

**/s/Sharon Ferguson**

First # Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name	
1	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	RP-25-302
2	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	RP-25-302
3	Brooke	Cunningham	health.review@state.mn.us	Minnesota Department of Health		PO Box 64975 St. Paul MN, 55164-0975 United States	Electronic Service		No	RP-25-302
4	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	RP-25-302
5	James D.	Larson	james.larson@avantenergy.com	Avant Energy Services		220 S 6th St Ste 1300 Minneapolis MN, 55402 United States	Electronic Service		No	RP-25-302
6	Thom	Petersen	thom.petersen@state.mn.us	Minnesota Department of Agriculture		625 North Robert St Saint Paul MN, 55155 United States	Electronic Service		No	RP-25-302
7	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	RP-25-302
8	Gerald L	Van Amburg	vanambur@cord.edu	Concordia College		4518 5th St S Moorhead MN, 56560 United States	Electronic Service		No	RP-25-302
9	Cynthia	Warzecha	cynthia.warzecha@state.mn.us	Minnesota Department of Natural Resources		500 Lafayette Road Box 25 St. Paul MN, 55155-4040 United States	Electronic Service		No	RP-25-302