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July 25, 2025

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

Re: *In the Matter of Great River Energy's 2023-2037 Integrated Resource Plan*

Docket No. ET2-RP-22-75

Acting Executive Secretary Bull,

CURE submits the following comments in response to Great River Energy's (GRE) request for a one-year extension of its Integrated Resource Plan (IRP) filing. We are sympathetic to the situation in which GRE finds itself—many are reeling from the chaotic and harmful actions happening with energy policy at the federal level. The future of federal funding and clarity about energy projects is a legitimate concern that CURE shares. We also appreciate GRE's desire to file as accurate a version of its IRP as possible. But as GRE acknowledges, uncertainty is inherent in forecasting. This is also the third extension of an IRP filing deadline that GRE has requested in five years.¹ For this and the following reasons, CURE urges the Commission to consider a shorter extension period,² and to consider requiring the filing of an interim report by April 1, 2026, that will allow for the sharing of key information despite uncertainty at the federal level.

I. Resource Planning is Inherently Uncertain

IRPs are forward-looking assessments of how a utility intends to reliably maintain customers' energy demands over the forecast period while also meeting the state's climate and energy conservation goals. This is an iterative process with multiple rounds of comment periods, information requests by intervenors, in some cases a contested case hearing before an Administrative Law Judge, and ultimately a decision by the Commission about whether the utility can proceed as planned. An IRP is not a static, unchanging document that lasts for the

¹ Great River Energy, *Extension Request*, eDockets No. [20206-164291-02](#) (2020); Great River Energy, *Extension Request*, eDockets No. [20221-181850-01](#) (2022).

² CURE recently joined an extension request in the Minnesota Power IRP docket that was granted by the Commission. The request was for an extension of ten weeks due to timing constraints with modeling (affected by the same change in federal policy) being completed by the Clean Energy Organizations. See Clean Energy Organizations, *CEOs Extension Request*, eDockets Document No. [20257-221352-01](#).



entire 15-year planning horizon. Utilities continuously update their plans because customer demands, weather patterns, MISO requirements, state and federal regulations, and the cost and availability of technologies change the calculations on which IRPs are based. Additionally, the Commission's final order on an IRP for electric cooperatives like Great River Energy is only advisory, not compulsory.³

The Commission's rules recognize the inherent uncertainty in planning by directing utilities to "show the resource options the utility *believes it might use* to meet those needs," and "to identify a resource option *generically*," unless a specific resource or commitment exists at the time of filing.⁴ The rules acknowledge the shifting nature of our energy system, asking utilities to "specify how the implementation and use of those resource options would vary with changes in supply and demand circumstances."⁵ And, if circumstances do change after an IRP is filed and approved, utilities can submit a Notice of Changed Circumstance.⁶

Uncertainty is a fact of energy planning; it should not be the sole reason to delay the timely filing of an IRP. While GRE's concerns about federal policy and the impacts on pricing are well-founded, the other issues GRE identifies will always be uncertain, no matter the timing of an IRP filing. It is also unclear from GRE's request why it believes any of these issues will be resolved or more certain by the proposed April 1, 2027, filing deadline. Presumably, the same administration will still be in place and will likely still be causing turmoil with its dismantling and defunding of federal agencies, attempted rescissions of dedicated federal funding, and back-and-forth tariff threats, among other chaotic actions.

II. GRE's Arguments for a One-Year Extension are not Persuasive

CURE does not believe that all the issues identified by GRE in its request support a one-year extension of the IRP deadline. And again, while CURE shares GRE's concerns about federal policy changes, there is no obvious support for its statement that clarity from the federal government will be realized within that additional time. If GRE can explain why it believes such clarity is forthcoming, it would help the Commission in making its decision on this request and allow the public to understand why additional time may be reasonable. But GRE's remaining arguments about the uncertainty regarding data centers and the Carbon-Free Standard (CFS) are not persuasive.

First, GRE has already indicated that it has information regarding potential data center load growth. In October 2024, the Commission held an informational presentation about data centers and anticipated load growth for Minnesota utilities. During that meeting, GRE acknowledged that significant load growth from data centers was not only expected but already being actively discussed within its membership. GRE stated that "in the next 5 to 7 years, it's a reasonable expectation amongst our membership we might see more than 1000 megawatts of new data

³ Minn. Stat. § 216B.2422, subd. 2(b).

⁴ Minn. R. 7843.0400, subp. 2 (emphasis added).

⁵ *Id.*

⁶ Minn. R. 7843.0500, subp. 5. *See also* Great River Energy, *Notice of Changed Circumstances*, eDockets Document No. [20251-213811-01](#).

center growth.”⁷ GRE also emphasized that demand could potentially double in the next decade. Despite this, GRE expressed confidence in its planning framework, stating that the growth “is nothing new to us—it’s just a little bit of a bigger challenge. The shape is the same, we just need to scale up the solutions for how we are thinking about this.”⁸ It seems fair to say then, that GRE has been aware of this impending growth and would have sufficient information to incorporate it into its integrated resource planning for the April 1, 2026, deadline. Furthermore, the actual demand from data centers will be a constantly moving target, so an additional year for planning seems unlikely to shed significantly more light on this issue.⁹

Second, state policy around data centers has, for 2025, been resolved.¹⁰ It is also unlikely that the state legislature would pass new laws by the April 1, 2026, filing deadline, given the timing of the legislative session. That additional policies may be passed, or that existing laws may be amended in forthcoming sessions is always a reality. Whether a certain policy is adopted, repealed, or amended will not be more certain in 2027 than 2026. Under GRE’s logic, utilities could perpetually extend the IRP deadline because there is *always* the risk of state policy changing. This is not a valid reason to extend the deadline for filing an IRP.

Finally, the CFS was signed into law in 2023, with the understanding that the Commission would be opening a docket to answer a number of questions about implementing the law. GRE has known about compliance with the law and the Commission’s implementation process for the last two years. GRE has also been an active participant in the Commission’s ongoing dockets on this issue and even submitted several requests to extend comment periods.¹¹ And both Xcel and Minnesota Power have managed to file timely IRPs, despite the ongoing dockets on implementation of the CFS.¹² Though CURE appreciates GRE holding itself to a high standard of planning accuracy, implementation of the CFS is clearly not a barrier to a timely IRP.

III. Interim Report

It is important that GRE submit timely IRPs, as this is in many cases the only way for member-owners to get information about the future of the generation and transmission cooperative. The point of an IRP is to encourage forward thinking by the utility and allow transparency for customers, member-owners, and members of the public. The Commission understands that utilities plan with the best available information at hand, and that circumstances can and do change.

⁷ Minnesota Public Utilities Commission, *External Planning Meeting: Data Center Development in Minnesota*, Oct. 29, 2024, 2:26:26, recording available at https://minnesotapuc.granicus.com/player/clip/2439?view_id=2&redirect=true.

⁸ *Id.* at 2:27:17.

⁹ Although if GRE has information about why it believes it will know the future data center load with certainty by April 1, 2027, that would be helpful for the Commission and the public to know.

¹⁰ See 2025 Minn. Laws Ch. 12.

¹¹ CURE appreciated and supported those extension requests and even submitted its own. See, e.g., Great River Energy, *Request for Extension of Comment Periods*, eDockets Document No. [20242-204065-01](#); CURE, *Request for Extension of Comment Periods and for Public Hearing*, eDockets Document No. [20246-207412-01](#).

¹² Minnesota Power, *2025-2039 Integrated Resource Plan*, eDockets Document No. [20253-215986-11](#); Xcel Energy, *Upper Midwest Integrated Resource Plan 2024-2040*, eDockets Document No. [20242-203027-01](#).

Still, CURE recognizes that these are unique times for all utilities, and electric cooperatives in particular. To attempt to balance these interests, CURE respectfully suggests that if the Commission grants GRE an extension, it also orders GRE to submit an interim report on or before April 1, 2026, that includes updates on the issues identified by GRE in its request. The report should include:

- A summary of the data center interest GRE has received in the last two years, with a range of anticipated demand from data center development over the next 5, 10, and 15 years.
- A statement about GRE's plan for meeting potential data center demand, including whether GRE believes it will need to build new natural gas generation, prolong operation of Spiritwood Station beyond 2040, or extend its PPA with Rainbow Energy from Coal Creek Station beyond 2031.
- Actions GRE has or intends to take regarding very large customers to protect existing member-owners from the costs attributable to the very large customer, such as planning, constructing, and operating new generation or transmission.
- A summary of information GRE has received and can share publicly (or via Trade Secret filing) about its New ERA award.

CURE appreciates GRE bringing this request to the Commission well in advance of the April 1, 2026, deadline and looks forward to continuing to work with GRE on these issues.

Sincerely,
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