



July 16, 2019

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place East, Suite 350
St. Paul, MN 55101-2147

VIA ELECTRONIC SERVICE

**Re: Sierra Club, Fresh Energy, and the Minnesota Center for Environmental
Advocacy's Petition to Intervene In the Matter of Basin Electric Power
Cooperative's Optional Integrated Resource Plan, Docket No. ET6125/RP-19-425**

Dear Mr. Wolf:

Attached is the Petition to Intervene of Sierra Club, Fresh Energy, and the Minnesota Center for Environmental Advocacy in the following matter:

In the Matter of Basin Electric Power Cooperative's Optional Integrated Resource Plan

Sincerely,

/s/ S. Laurie Williams
Staff Attorney
Sierra Club
1536 Wynkoop St. Suite #200
Denver, CO 80202
laurie.williams@sierraclub.org
(303) 454-3358

Enclosures

STATE OF MINNESOTA
PUBLIC UTILITIES COMMISSION

In the Matter of
Basin Electric Power Cooperative's
Optional Integrated Resource Plan

DOCKET NO. ET6125/RP-19-425

**PETITION TO INTERVENE BY SIERRA CLUB, FRESH ENERGY, AND THE
MINNESOTA CENTER FOR ENVIRONMENTAL ADVOCACY**

Pursuant to Minn. R. 7843.0300 and 7829.0800, Sierra Club, Fresh Energy, and the Minnesota Center for Environmental Advocacy hereby petition to intervene in the above-referenced docket.

Fresh Energy is an independent energy policy nonprofit that has helped lead Minnesota's transition to a clean energy economy through policy analysis and advocacy in legislative and regulatory settings.

The Minnesota Center for Environmental Advocacy (MCEA) is a nonprofit environmental organization that works in the courts, the legislature, and state agencies to protect Minnesota's wildlife, natural resources and the health of its people. MCEA's five program areas include a Climate and Energy Program to advance the pursuit of environmentally sustainable energy policies. MCEA has members throughout the state.

Sierra Club is a national nonprofit environmental organization with approximately 790,000 members nationwide, and over 18,700 members in Minnesota. Sierra Club works to protect and improve air and water quality in Minnesota, limit the adverse effects of climate change, and promote Minnesota's transition to clean and affordable energy. Sierra Club has members who live in areas that obtain electricity from Basin Electric Power Cooperative ("Basin Electric"), and who have a strong interest in maximizing the amount of their electricity

consumption that comes from renewable, affordable, and environmentally responsible energy sources.

Consistent with their respective missions, Petitioners regularly participate in resource planning matters before the Minnesota Public Utilities Commission (“the Commission”) with an interest in advancing resource choices that minimize or eliminate pollutant emissions, and advancing the transition to clean, affordable, renewable energy and energy efficiency. Because Basin Electric’s O-IRP has a direct impact on its resource decisions, Petitioners have an interest in the outcome of this proceeding. Although Basin Electric is not required to comply with the same IRP requirements as an investor-owned utility under Minnesota law, Minn. Stat. 216.2422, subsection 2b, states that, with respect to municipalities and cooperatives, “[t]he commission may take whatever action in response to a report under this subdivision that it could take with respect to a report” under the traditional IRP provision. Moreover, Minn. Stat. 216.2422, subsection 2, subpart (b) states that “[i]n the resource plan proceedings of all other utilities, the commission’s order shall be advisory and the order’s findings and conclusions shall constitute prima facie evidence which may be rebutted by substantial evidence in all other proceedings.” In short, Basin Electric’s O-IRP has real consequences for future proceedings and resource decisions.

No other party can adequately represent our organizations’ interests. Our organizations have an interest in understanding the costs of Basin Electric’s generating resources, whether Basin Electric has explored lower cost, cleaner resource alternatives, and how Basin Electric’s resource plans may or may not represent a barrier to achieving Minnesota’s greenhouse gas emissions targets.

Our organizations bring significant expertise in the area of integrated resource planning. Sierra Club, Fresh Energy, and MCEA have jointly or individually intervened and/or provided testimony or comments in many resource planning proceedings before this Commission, including the resource planning processes of Xcel Energy, Minnesota Power, Otter Tail Power and Great River Energy.

Petitioners respectfully request to partake in this proceeding in order to bring transparency regarding the costs of Basin Electric's generating resources and potential cleaner and more affordable sources of power, and in order to ensure that Basin Electric's resource planning is appropriately designed to advance the goals of energy conservation, increased use of renewable energy, and affordability.

For the foregoing reasons, Petitioners respectfully request full party status in this matter. If allowed, Petitioners intend to participate in this docket jointly.

Dated: July 16, 2019

Respectfully submitted,

/s/ S. Laurie Williams
Sierra Club
Staff Attorney
1536 Wynkoop St. Suite #200
Denver, CO 80202
Tel: (303) 454-3358
Laurie.williams@sierraclub.org

Attorney for Sierra Club

/s/ Allen Gleckner
Fresh Energy
Senior Director, Energy Markets & Regulatory Affairs
408 St. Peter Street, Suite 220
St. Paul, MN 55102
Tel: (651) 726-7570
gleckner@fresh-energy.org

/s/ Kevin P. Lee
Kevin Lee
Minnesota Center for Environmental Advocacy
1919 University Avenue West, Ste. 515
St. Paul, MN 55101
Tel: (651) 223-5969
klee@mncenter.org

*Attorney for Minnesota Center for
Environmental Advocacy*

CERTIFICATE OF SERVICE

I, S. Laurie Williams, hereby certify that I have, served or caused to be served copies of the following document on the attached list of persons by electric filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States mail.

Sierra Club Petition to Intervene

Docket No. ET6125/RP-19-425

Dated this 16th day of July 2019

/s/ S. Laurie Williams

Sierra Club

Staff Attorney

1536 Wynkoop St. Suite #200

Denver, CO 80202

Tel: (303) 454-3358

Laurie.williams@sierraclub.org