

From: [Wufoo](#)
To: [Staff, CAO \(PUC\)](#)
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Provide the docket's number. *	E 015/CI-18-254

Leave a comment on the docket. *

Please consider the comments below in the context of Minnesota Power's current Integrated Distribution Plan (IDP), from the point of view of a group of people who have been working in Grand Rapids MN to establish a Community Solar Garden.

I am part of a team of residents in Grand Rapids MN that has been working with the Grand Rapids Public Utilities (GRPU) to explore and hopefully establish a Community Solar Garden here in Grand Rapids MN. Our team has been educating ourselves & the local community, and working with the GRPU to move this project forward. We have been working on this project for over four years now.

In the last couple of years, the GRPU hired Jill Cliburn of Cliburn and Associate to design a community solar program that would work for Grand Rapids. A number of meetings were held between Ms. Cliburn and her team, the GRPU staff and commissioners, the local community, and our team of local residents. It was a very open and transparent process, the upshot of which was that the economics seemed favorable for a good sized solar array, combined with lithium ion battery storage. Based on this, the GRPU was intending to hire Cliburn and Associates to develop an RFP to move the project forward. It was to our considerable dismay when at the end of 2018, MN Power asserted that as the wholesale power provider to the GRPU, MN Power's contract with the GRPU didn't allow the GRPU to sign a Power Purchase Agreement with an entity to develop a Community Solar Garden other than with MN Power. Further to this, MN Power suggested they were prepared to take legal action if the GRPU went ahead with these plans. MN Power did propose an alternative plan which would involve MN Power heading up the project and working with other developers on a pass-through basis. The GRPU staff and commissioners felt that the contract with MN Power did allow for the development of a Community Solar Garden even if it involved signing a Power Purchase Agreement with an outside third party. The GRPU however didn't feel that it would be a wise use of a considerable amount of the public's money to go head to head with MN Power in court, thus the GRPU reluctantly agreed to let MN Power be the primary developer of the solar plus battery storage project.

About a year ago, at the urging of the GRPU and our team, MN Power did hire Cliburn and Associates to help MN Power develop the RFP. Unfortunately, soon after this, it became apparent that the contract between Cliburn and Associates and MN Power did not permit Jill Cliburn and her team to communicate openly and directly with the GRPU or our team. Our efforts to reach out to Ms. Cliburn were met with responses indicating that she was unable to communicate directly with us or the GRPU, per her contract with MN Power. Over the last year, our team has felt frustrated with the level of communication we have had from MN Power, and the feeling that what was originally a community stakeholder driven project, disappeared into the MN Power back rooms.

Representative(s) from MN Power are set to meet with the GRPU and our team on January 31st (2 days from now) with an update on the project and which proposal if any will be accepted. We have not heard formal details of the substance of what will be presented at this meeting on the 31st, but preliminary reports are that the economics look significantly less favorable than those projected by Cliburn and Associates some 15 months earlier. This is puzzling as solar panels and lithium ion batteries have come down in price appreciably in the interim. Also, we have heard favorable reports from utilities that have been using batteries for demand reduction.

My preference would be to have submitted comments regarding MN Power's IDP after we had heard a formal report from MN Power regarding this project on the 31st of this month, but I am aware that the public comment period for the IDP ends today (January 29th). It is hard not to question the timing of this January 31st meeting being just after the end of public comment period for the IDP.

When MN Power was trying to allay concerns that our team and the GRPU had about MN Power's obvious conflicts of interest in the success or otherwise of this Grand Rapids project, MN Power staff informed us that one of their interest in the Grand Rapids project was to investigate battery storage as an option as part of MN Power's future energy distribution mix. We were told by MN Power staff, that lessons learned would be extremely valuable to them as they evaluated the potential of battery storage as part of MN Power's energy distribution mix. It is therefore with great surprise that the draft IDP from MN Power has no mention at all of lessons learned from the Grand Rapids project.

Thank you for considering my comments
