



June 14, 2017

Daniel P. Wolf  
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, Division of Energy Resources**  
Docket No. ET6133/RP-17-468

Dear Mr. Wolf:

Attached are the *Comments* of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the following matter:

Minnesota Municipal Power Agency (MMPA) Request for a One-Year Extension to August 1, 2018 to file its Integrated Resource Plan.

The Request was filed on June 8, 2017 by:

Oncu Er  
Agent for MMPA  
Avant Energy  
220 South 6th Street, Suite 1300  
Minneapolis, MN 55402

Based on its review of MMPA's request, the Department recommends that the Minnesota Public Utilities Commission (Commission) **approve MMPA's request for a one-year extension to file its next Integrated Resource Plan.**

The Department is available to answer any questions that the Commission may have.

Sincerely,

/s/ CHRISTOPHER T. DAVIS  
Analyst Coordinator

CTD/lt  
Attachment



## Before the Minnesota Public Utilities Commission

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### Comments of the Minnesota Department of Commerce, Division of Energy Resources

Docket Number: ET6133/RP-17-468

#### I. BACKGROUND

On February 10, 2015, in Docket No. ET6133/RP-13-1165, the Minnesota Public Utilities Commission (Commission) accepted Minnesota Municipal Power Agency's (MMPA or the Agency) 2014-2028 Integrated Resource Plan (IRP) and set a due date of August 1, 2017 for the Agency's next IRP.

On June 8, 2017, MMPA submitted a Petition requesting that the Commission allow MMPA to delay its next IRP filing until August 1, 2018. MMPA requested the one-year delay so that the Agency has the time necessary to identify and plan MMPA's next energy resource in sufficient detail that the Agency can combine the Certificate of Need for the chosen resource with its IRP.

#### II. DEPARTMENT ANALYSIS

MMPA's last IRP was filed on December 20, 2013 in Docket No. ET6133/RP-13-1165. The Commission conditioned its approval of MMPA's current August 1, 2017 due date upon MMPA filing the following status reports by August 1, 2016:

- Its demand-side management efforts.
- Its distributed generation efforts.
- The effect, if known, of federal environmental regulations.

MMPA submitted the required compliance on July 21, 2016.

Minnesota Statutes 216B.242, Subd. 6 concerns the consolidation of resource planning and certificate of need (CN) and states:

A utility shall indicate in its resource plan whether it intends to site or construct a large energy facility. If the utility's resource plan includes a proposed large energy facility and construction of that facility is likely to begin before the utility files its next resource plan, the commission shall conduct the resource plan proceeding consistent with the requirements of section 216B.243 with respect to the proposed facility. If the commission approves the proposed facility in the resource plan, a separate certificate of need proceeding is not required.

The Department supports the efficient combination of the IRP and CN processes. The only drawback would be if the Commission needed to review MMPA's IRP earlier due to concerns about the Agency's reliability. In its July 21, 2016 compliance filing MMPA indicated that it would procure an additional 45 MW from natural gas combustion turbines (CT) and 7 MW of solar additions in 2017. Since that filing:

- MMPA brought online 46 MW of natural gas in the first quarter of 2017,
- The Agency's 7-MW solar project is in construction phase and is contracted to be in service by the end of 2017,
- MMPA bought 5 MW for 2018 and 70 MW for 2019 in the bilateral capacity market.

Based on the procurement of these new resources, MMPA will not need additional resources until 2020. Consequently, the Department concludes that delaying MMPA's next IRP, combined with a Certificate of Need, is reasonable.

### **III. RECOMMENDATION**

The Department recommends that the Commission approve MMPA's request to delay filing its next IRP until August 1, 2018.