



Minnesota Center for Environmental Advocacy

The legal and scientific voice protecting and defending Minnesota's environment

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August 29, 2014

Dr. Burl W. Haar
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, MN 55101-2147

VIA ELECTRONIC FILING

*Re: In the Matter of Otter Tail Power's 2014-2028 Integrated Resource Plan
PUC Docket No. E017/RP-13-961*

Dear Dr. Haar,

In connection to the above-referenced matter enclosed are the Supplemental Comments filed on behalf of the Izaak Walton League of America – Midwest Office, Fresh Energy, Sierra Club, and the Minnesota Center for Environmental Advocacy (collectively “Environmental Intervenors”). Also attached is the Affidavit of Service.

Sincerely,

/s/ Leigh Currie
Leigh Currie
Staff Attorney

Enclosures

cc: Attached Service list

**STATE OF MINNESOTA
PUBLIC UTILITIES COMMISSION**

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In the Matter of Otter Tail Power’s 2014-2028 Integrated Resource Plan MPUC Docket No. E017/RP-13-961

**SUPPLEMENTAL COMMENTS OF IZAAK WALTON LEAGUE – MIDWEST
OFFICE, FRESH ENERGY, SIERRA CLUB, AND MINNESOTA CENTER FOR
ENVIRONMENTAL ADVOCACY**

The Izaak Walton League of America – Midwest Office, Fresh Energy, Sierra Club, and Minnesota Center for Environmental Advocacy (“Environmental Intervenors”) appreciate the opportunity to submit Supplemental Comments to respond to Otter Tail Power’s (“OTP’s”) analysis of the potential impacts on its resource planning of the U.S. EPA’s proposed Clean Power Plan. OTP’s take-away from its review of the draft EPA rule is that it should not be required in this resource plan to construct cost-effective wind power projects until the outcome of the EPA rule is more clear.¹ OTP suggests that it may not have such clarity until inevitable litigation over the Clean Power Plan plays out.²

Environmental Intervenors of course agree with OTP that the details of the final Clean Power Plan are uncertain at this time. It is certain, however, that the Minnesota Legislature has established state Greenhouse Gas (“GHG”) reduction goals and has required utilities to assess compliance with the state goals in resource planning. *See* Minn. Stat. §§ 216H.02, subd. 1,

¹ OTP August 1, 2014 Reply Comments, pp. 10-11.

² *Id.*

216B.2422, subd. 2c (2014). We therefore disagree with OTP that the uncertainty of a final EPA rule should delay OTP's clean energy commitments needed to comply with state GHG objectives. Through resource planning at the state level, the Commission can approve cost-effective renewable energy. In this docket, adding wind power to OTP's portfolio is cost-effective irrespective of the Clean Power Plan at the federal level.³

More important, for OTP to meet state GHG reduction goals it must *accelerate* wind power investments to 2015.⁴ As Environmental Intervenors stated in earlier comments, the DOC modeling scenario that complies with statutory GHG reductions is more cost-effective on a PVSC basis than either OTP's or DOC's preferred plans.⁵ It requires 300 MW more wind than DOC recommended as its Preferred Plan. We recognize that the realities of procurement processes mean that this wind power is unlikely to be online in 2015; but given its immediate need OTP must nevertheless prioritize issuing an RFP for 300 MW of wind energy. The same goes for beginning timely procurements that will allow additional 2017 and 2019 wind power installations.

The date of a final EPA carbon dioxide rule, the effective date of Minnesota's State Implementation Plan, or even possible U.S. Supreme Court review are not valid excuses for OTP to stall cost-effective wind power additions that are essential to meeting the GHG reductions the Minnesota Legislature has already established. The Commission should require OTP's short-term action plan to take the steps necessary to achieve GHG reduction set forth in Minnesota law.

³ See, Department of Commerce – Division of Energy Resources (“DOC”) May 2, 2014 Comments, pp.30-31; and Environmental Intervenors August 1, 2014 Reply Comments, pp. 2-3.

⁴ Id.

⁵ Environmental Intervenors August 1, 2014 Reply comments.

Dated: August 29, 2014

Respectfully submitted,

/s/ Leigh Currie

Leigh Currie

Minnesota Center for Environmental Advocacy

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STATE OF MINNESOTA
MINNESOTA PUBLIC UTILITIES COMMISSION

In the Matter of Otter Tail Power's 2014-2028
Integrated Resource Plan

AFFIDAVIT OF SERVICE

PUC Docket No. E017/RP-13-961

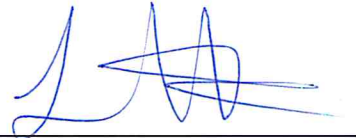
STATE OF MINNESOTA)
)ss.
COUNTY OF RAMSEY)

Leah Harms being duly sworn, says that on the 29th day of August, 2014 she served via U.S. mail and e-dockets the following:

- Supplemental Comments filed on behalf of Environmental Intervenors

on the following persons, in this action, by filing through e-dockets or mailing to them a copy thereof, enclosed in an envelope, postage prepaid, and by depositing the same in the post office at St. Paul, Minnesota, directed to said persons at the last known mailing address of said persons:

Attached Service List.



Leah Harms

Subscribed and sworn to before me
this 29th day of August, 2014



Leigh Currie



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