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In the Matter of Minnesota Power's Petition for  
Approval of the EnergyForward  
Resource Package

MPUC Docket No. E015/M-17-568

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## **LIUNA MINNESOTA & NORTH DAKOTA COMMENT**

**JULY 1, 2020**

The Laborers District Council of Minnesota and North Dakota "LIUNA Minnesota & North Dakota" appreciates the opportunity to offer comments in support of the May 29, 2020 request by Minnesota Power ("MP") for a six-month extension in the deadline to submit the utility's proposed Integrated Resource Plan ("IRP").

LIUNA Minnesota & North Dakota represents 12,000 unionized construction laborers statewide, including hundreds of members who live in Northern Minnesota and rely on MP not only as residential customers, but also as employees of contractors that build and maintain infrastructure both for MP and the large industrial customers that the utility serves.

Northern Minnesota was going through difficult economic times even before we were hit with the COVID-19 pandemic, and now we are seeing signs of an economic depression as mines and mills shut down putting thousands out of work. Electricity is a lynchpin of Minnesota's industrial economy, and it is critical now more than ever that we get it right when it comes to planning for the future.

We had the good fortune of being invited to participate in an innovative process that was initiated by MP to allow stakeholders to participate in the development of the utility's IRP. We found the process incredibly productive and we believe that we were on the path to achieving a better understanding of the options and establishing common ground among diverse stakeholders when the process was cut short due to COVID.

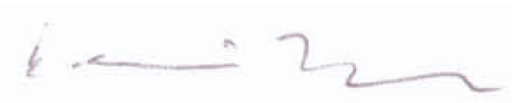
We believe that an extension would be justified for the sole purpose of supporting the successful completion of that process. But that is not the only reason an extension is needed. The pandemic has had a profound effect on Northern Minnesota's energy-intensive, export-dependent economy, which could create additional hurdles to charting a path toward clean and affordable electric generation. There is currently too much economic uncertainty for MP to propose or for the Commission to adopt a firm long-range plan for the utility, and we believe that a six-month delay will provide time to better assess the situation and incorporate new data.

We understand that some parties may believe the time is now to press forward in the hope that the circumstances will hasten the retirement of MP's remaining coal-fired units. We don't know what the future holds for Boswell, but we know that we would certainly oppose a rush to decision on retirement at a time when there are so many uncertainties, and we urge all parties to be patient to let the dust

settle and let the stakeholder process work.

We ask the Commission to grant MP's extension request and look forward to participating in the process.

Respectfully,

A handwritten signature in dark ink, appearing to read "Kevin Pranis", is centered below the text "Respectfully,". The signature is fluid and cursive.

Kevin Pranis, Marketing Manager

Dated: July 1, 2020

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