

**Minnesota Department of Commerce
Division of Energy Resources
Information Request**

Docket Number: ET-6133/RP-25-302
Requested From: MMPA, Oncu Er
Type of Inquiry: General

Nonpublic Public
Date of Request: 9/5/2025
Response Due: 9/15/2025

Requested by: Taryn Waite
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Phone Number(s): 651-539-2746

Request Number: 4
Topic: Renewable Energy Standards
Reference(s): Minn. Stat. 2024 216B.1691, subd. 2a

Request: Please provide a table listing, for each year in the planning period, the percentage of MMPA's total retail electric sales projected to be provided from generation or procurement of the eligible energy technologies described in Minn. Stat. 216B.1691, Subd. 1.

Response: The following table lists the percentage of MMPA's total retail electric sales that are projected to be from eligible energy technologies as defined in Minn. Stat. 216B.1691, Subd. 1 (c). The projections include existing, committed, and prospective resources.

Calendar Year	Percentage of Retail Electric Sales from Eligible Energy Technologies
2025	47%
2026	46%
2027	46%
2028	52%
2029	78%
2030	79%
2031	79%
2032	79%
2033	88%
2034	98%
2035	97%
2036	96%
2037	95%
2038	94%
2039	93%
2040	100%

To be completed by responder

Response Date: 9/12/2025
Response by: Oncu Er
Email Address: Oncu.Er@avantenergy.com
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Requested by: Taryn Waite
Email Address(es): Taryn.Waite@state.mn.us
Phone Number(s): 651-539-2746

Request Number: 5
Topic: Environmental Cost
Reference(s): Section 14. Environmental Costs of Capacity Resources

Request: On page 53 of its 2025-2039 Integrated Resource Plan, MMPA provides a table of the environmental cost values used to evaluate each alternative capacity resource and states that these values were based on the PUC's December 19, 2023, Order Addressing Environmental and Regulatory Costs. MMPA's total cost model does not vary over time and uses a single environmental cost value for each resource. Please explain how the values in the table were derived from the time series of cost values referred to by the Order.

Response: The environmental costs shown in the table on page 53 of MMPA's 2025-2039 IRP represent the average environmental cost, expressed in 2025\$/MWh, over the expected operating life of the resource. These values are based on the PUC's December 19, 2023, *Order Addressing Environmental and Regulatory Costs*.

For the combustion turbine and combined-cycle resources, MMPA assumed an in-service date of 2028 and a 40-year operating life. The time series of environmental costs from the Order was averaged over the 2028–2067 operating life (2020\$/ton of pollutant), then escalated to 2025 dollars using the Consumer Price Index from the U.S. Bureau of Labor Statistics. The resulting value was adjusted by subtracting the regulatory cost to obtain the final environmental cost, which was then multiplied by the resource's emission rate (tons/MWh) to get the cost values shown in the table.

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