



220 South Sixth Street Suite 1300 Minneapolis, MN 55402
tel. 612.349.6868 fax. 612.349.6108 www.mmpa.org

September 19, 2025

VIA E-FILING

Mike Bull
Acting Executive Secretary
Minnesota Public Utilities Commission
121 7th Place E., Suite 350
Saint Paul, MN 55101

**Re: Minnesota Municipal Power Agency Reply Comments
DOCKET NO: ET-6133 / RP-25-302**

Dear Mr. Bull:

Minnesota Municipal Power Agency (MMPA) submits the following reply comments in response to the Minnesota Department of Commerce's (DOC) comments filed on August 20, 2025.

The response includes:

- An assessment of additional resource options for meeting projected needs and
- A nontechnical summary of the demand projection methodology and capacity resource analysis.

Please contact me at (612) 252-6542 if you have any questions.

Very truly yours,

Avant Energy, Inc.
Agent for MMPA

/s/Oncu Er

Oncu Er

Enclosure
cc: Service List

A. Resource Alternatives

Minnesota Rule 7843.0400, Subp. 3(A) states that if a utility's existing resources are projected to be inadequate to meet future needs that the utility considers a range of resource options. In addition to the options MMPA included in the initial Integrated Resource Plan filing, the DOC recommended that MMPA include an assessment of cogeneration, load-control equipment, and new transmission facilities.

Cogeneration

Cogeneration is not a practical option for MMPA's resource planning. Only one large thermal user exists among MMPA's member utilities and that customer already operates its own cogeneration system. Beyond this, the customer base does not include other significant thermal users that could effectively utilize the heat output from cogeneration facilities. In addition, achieving a fully carbon-free cogeneration system presents considerable challenges. For these reasons, cogeneration is not included as a future resource alternative in MMPA's IRP, though individual member utilities may still evaluate projects where they are locally feasible.

Load-Control Equipment

MMPA is a wholesale provider and does not serve retail customers directly. Load control programs including time-of-day rates for EVs and residential HVAC load control, may be managed individually by MMPA's member utilities. Because these programs are not operated at the wholesale level, load-control equipment is not evaluated as a resource option in MMPA's IRP.

Transmission Facilities

When locating generation facilities, MMPA considers the impact on transmission facilities. It has, therefore, located facilities in its member communities to reduce the need for new transmission facilities.

MMPA does not have any opportunities to invest in transmission to bring unused generation to its load. Further, MMPA has not identified any transmission facilities which could decrease its transmission losses which would, effectively, increase its supply.

MMPA does not independently develop transmission facilities. Instead, MMPA fulfills its transmission planning obligations through active participation in the Midcontinent Independent System Operator (MISO) transmission expansion planning process (MTEP). This process brings together utilities and stakeholders to ensure system reliability, identify and advance necessary transmission projects, and fairly allocate associated costs. This regional approach ensures that MMPA's future transmission needs are addressed in a Commission-recognized and comprehensive manner. For these reasons, new transmission facility development is not separately analyzed in MMPA's IRP.

B. Nontechnical Summary

Demand Projection Methodology

MMPA projected future energy needs by analyzing 20 years of historical usage data (January 2005–May 2025) from its 12 member communities. The analysis considered population, income, and weather trends,

Mr. Mike Bull
September 19, 2025

as well as anticipated new large loads such as data centers and electric vehicles. Projections were then adjusted to account for expected conservation program savings.

Peak demand was estimated using historical seasonal load factors and adjusted for anticipated impacts of electric vehicles and large data centers. Conservation effects were embedded in the energy forecasts used for demand calculations.

Key results include:

- Projected annual energy growth: **0.6%**
- Projected summer peak demand growth: **0.5%**

Capacity Resource Analysis

MMPA used a total cost model to evaluate potential resource alternatives for meeting future capacity requirements. The model compared resource options based on:

- Capital, operations and maintenance (O&M), fuel, and regulatory compliance costs
- Varying capacity factors (operating frequency)
- A sensitivity analysis for capital, fuel, and regulatory assumptions

Environmental costs were evaluated separately. This methodology allows MMPA to compare diverse resources under a range of economic and operating conditions to ensure a least-cost, reliable resource portfolio.

Last Name	First Name	Email	Company Name	Delivery Method	View Trade Secret
Bergman	Sasha	sasha.bergman@state.mn.us	Public Utilities Commission	Electronic Service	No
Bull	Mike	mike.bull@state.mn.us	Public Utilities Commission	Electronic Service	Yes
Commerce Attorneys	Generic	commerce.attorneys@ag.state.mn.us	Office of the Attorney General - Department of Commerce	Electronic Service	Yes
Cunningham	Brooke	health.review@state.mn.us	Minnesota Department of Health	Electronic Service	No
Er	Oncu	oncu.er@avantenergy.com	Avant Energy, Agent for MMPA	Electronic Service	No
Ferguson	Sharon	sharon.ferguson@state.mn.us	Department of Commerce	Electronic Service	No
Petersen	Thom	thom.petersen@state.mn.us	Minnesota Department of Agriculture	Electronic Service	No
Residential Utilities Division	Generic Notice	residential.utilities@ag.state.mn.us	Office of the Attorney General - Residential Utilities Division	Electronic Service	Yes
Van Amburg	Gerald L	vanambur@cord.edu	Concordia College	Electronic Service	No
Warzecha	Cynthia	cynthia.warzecha@state.mn.us	Minnesota Department of Natural Resources	Electronic Service	No