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August 26, 2025

#### VIA E-FILING

Mr. Mike Bull – Acting Executive Secretary Minnesota Public Utilities Commission 121 7th Place East, Suite 350 Saint Paul, MN 55101-2147

Re: In the Matter of Basin Electric Power Cooperative's Optional Integrated Resource

Plan (IRP)

Docket No. ET6125/RP-25-266

Dear Mr. Bull:

Basin Electric Power Cooperative respectfully submits these Reply Comments.

These Reply Comments has been e-filed through www.edocket.state.mn.us. A copy of this filing is also being served upon the persons on the Official Service List of record.

Please let me know if you have any questions regarding this filing.

Sincerely,

David R. Moeller

**Direct Dial:** (612) 492-7422 **Email:** cbrusven@fredlaw.com

Dan A Moeller

DRM:ML Attachments

## STATE OF MINNESOTA BEFORE THE PUBLIC UTILITIES COMMISSION

Katie Sieben Chair

Hwikwon Ham Commissioner
Audrey Partridge Commissioner
Joseph Sullivan Commissioner
John Tuma Commissioner

In the Matter of Basin Electric Power Cooperative's Optional Integrated Resource Plan (IRP) MPUC Docket No. ET6125/RP-25-266

BASIN ELECTRIC POWER COOPERATIVE REPLY COMMENTS

### **INTRODUCTION**

On July 3, 2025, Basin Electric Power Cooperative (Basin Electric) filed an updated Notice of Changed Circumstance and Request for an Extension. Concurrently, Basin Electric also submitted its 2025 Optional Integrated Resource Plan (O-IRP) under Minn. Stat. § 216B.2422, subd. 2b.

On July 17, 2025, the Minnesota Public Utilities Commission (Commission) issued a Notice of Comment Period requesting comments on three topics:

- 1) Should the Commission grant Basin Electric's request to extend its IRP filing until October 1, 2027?
- 2) If the Commission grants the Cooperative's request, should the Commission require interim filings?
- 3) Are there other issues or concerns related to this matter?

On August 14, 2025, the Minnesota Department of Commerce (Department) filed initial comments and recommended approval of Basin Electric's request. In addition, Basin Electric member cooperatives Crow Wing Power, Wright-Hennepin Cooperative and L&O Power

Cooperative submitted comments supporting Basin Electric's request. Basin Electric provides

these reply comments in response to the initial comments.

The Department provided background information on the statutory criteria for filing an O-

IRP and a full Integrated Resource Plan (IRP), Basin Electric's forecast, and Basin Electric's

procedural request. The Department also analyzed Basin Electric's request for a variance under

Minn. R. 7829.3200 that the Commission vary Minn. R. 7843.0300 to grant Basin Electric an

extension until October 1, 2027, to submit a full IRP on the proposed procedural path. The

Department summarized its recommendations as follows:

The Department agrees with Basin that requiring the immediate filing of a

full IRP is not feasible and also that the criteria for granting a variance to Minn.

Rules 7843.0300 have been met. The Department recommends that the

Commission approve Basin's proposed variance and approve Basin's proposed

process.

Basin Electric appreciates the supportive comments from its member cooperatives and the

Department's review and recommendations. Basin Electric continues to respectfully request the

Commission approve the proposed procedural path and grant an extension until October 1, 2027,

to submit a full IRP.

Dated: August 26, 2025

Respectfully submitted,

Casey Jacobson

**BASIN ELECTRIC POWER COOPERATIVE** 

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Attorneys for Basin Electric Power Cooperative

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# In the Matter of Basin Electric Power Cooperative's Optional Integrated Resource Plan (IRP)

### MPUC Docket No. ET6125/RP-25-266

### **CERTIFICATE OF SERVICE**

Michael Latana certifies that on the 26th day of August, 2025, he e-filed true and correct copy the following documents on behalf of Basin Electric Power Cooperative via eDockets (www.edockets.state.mn.us):

## 1. Reply Comments

Said document was also served as designated on the Official Service Lists on file with the Minnesota Public Utilities Commission and as attached hereto.

Executed on: August 26, 2025 Signed: /s/ Michael Latana

Fredrikson & Byron, P.A. 60 South Sixth Street Suite 1500 Minneapolis, MN 55402

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Michael	Ahern	ahern.michael@dorsey.com	Dorsey & Whitney, LLP		50 S 6th St Ste 1500 Minneapolis MN, 55402-1498 United States	Electronic Service		No	RP-25-266
2	Brian	Bell	bell.brian@dorsey.com	Dorsey & Whitney LLP		50 South Sixth St. Suite 1500 Minneapolis MN, 55402 United States	Electronic Service		No	RP-25-266
3	William	Black	bblack@mmua.org	MMUA		Suite 200 3131 Fernbrook Lane North Plymouth MN, 55447 United States	Electronic Service		No	RP-25-266
4	B. Andrew	Brown	brown.andrew@dorsey.com	Dorsey & Whitney LLP		Suite 1500 50 South Sixth Street Minneapolis MN, 55402-1498 United States	Electronic Service		No	RP-25-266
5	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	RP-25-266
6	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Attorney General -	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	RP-25-266
7	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	RP-25-266
8	Allen	Gleckner	gleckner@fresh-energy.org	Fresh Energy		408 St. Peter Street Ste 350 Saint Paul MN, 55102 United States	Electronic Service		No	RP-25-266
9	Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	RP-25-266
10	Benjamin	Hertz	bhertz@bepc.com	Basin Electric Power Cooperative		1717 E Interstate Ave Bismarck ND, 58503 United States	Electronic Service		No	RP-25-266
11	Casey	Jacobson	cjacobson@bepc.com	Basin Electric Power Cooperative		1717 East Interstate Avenue Bismarck ND, 58501 United States	Electronic Service		No	RP-25-266
12	Becky	Kern	bkern@bepc.com	Basin Electric Power Cooperative		1717 E Interstate Ave Bismarck ND, 58501 United States	Electronic Service		No	RP-25-266
13	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	RP-25-266

#	First Name	Last Name	Email	Organization Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
14	Jean	Schafer	jeans@bepc.com	Basin Electric Power Cooperative	1717 E Interstate Ave Bismarck ND, 58501 United States	Electronic Service		No	RP-25-266
15	Laurie	Williams	laurie.williams@sierraclub.org	Sierra Club	Environmental Law Program 1536 Wynkoop St Ste 200 Denver CO, 80202 United States	Electronic Service		No	RP-25-266