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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,

A handwritten signature in black ink that reads "David R. Moeller". The signature is written in a cursive, flowing style.

David R. Moeller
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Email: cbrusven@fredlaw.com

DRM:ML
Attachments

**STATE OF MINNESOTA
BEFORE THE
PUBLIC UTILITIES COMMISSION**

Katie Sieben
Hwikwon Ham
Audrey Partridge
Joseph Sullivan
John Tuma

Chair
Commissioner
Commissioner
Commissioner
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

Casey Jacobson
**BASIN ELECTRIC POWER
COOPERATIVE**
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Bismarck, ND 58503-0564
701-557-5413

Respectfully submitted,



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Attorneys for Basin Electric Power Cooperative

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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

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#	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