

Staff Briefing Papers

Meeting Date	April 3, 2025	Agenda Item *2
Company	Minnesota Power (MP or the Company)	
Docket No.	E015/RP-25-127	
	In the Matter of Minnesota Power's Application for Approval of its 2025-2039 Integrated Resource Plan	
Issues	<ol style="list-style-type: none">1. Should the Commission require Minnesota Power to include a bill insert and/or electronic notice to customers regarding public input in its IRP?2. Should the Commission order one or more public meetings on this matter?3. Should the Commission take any other actions related to soliciting public input?	
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✓ Relevant Documents	Date
Minnesota Power, Initial Filing, 2025-2039 Integrated Resource Plan	March 3, 2025
Minnesota Power, Initial Filing, Appendix A	March 3, 2025
Minnesota Power, Initial Filing, Appendix B	March 3, 2025
Minnesota Power, Initial Filing, Appendix C	March 3, 2025
Minnesota Power, Initial Filing, Appendix G	March 3, 2025
Minnesota Power, Initial Filing, Appendix H	March 3, 2025

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The attached materials are work papers of the Commission Staff. They are intended for use by the Public Utilities Commission and are based upon information already in the record unless noted otherwise.

✓ **Relevant Documents**

Minnesota Power, Initial Filing, Appendix J
Minnesota Power, Initial Filing, Appendix L
Minnesota Power, Initial Filing, Appendix P
Minnesota Power, Initial Filing, Appendix Q
Minnesota Power, IRP Filing Update Letter

Date

March 3, 2025
March 3, 2025
March 3, 2025
March 3, 2025
March 13, 2025

STATEMENT OF THE ISSUES

1. Should the Commission require Minnesota Power to include a bill insert and/or electronic notice to customers regarding public input in its IRP?
2. Should the Commission order one or more public meetings on this matter?
3. Should the Commission take any other actions related to soliciting public input?

BACKGROUND

On March 3, 2025, Minnesota Power (MP or the Company) filed its 2025-2039 Integrated Resource Plan (2025 IRP). According to the Petition's "Plan Highlights," the Company intends to:

- Add 400 megawatts (MW) of new wind projects by 2035, in addition to the 700 MW of renewables currently in development;
- Expand energy storage resources by 100 MW by 2035;
- Continue its plan to cease utilizing coal at the Boswell Energy Center by 2035;
- Add approximately 1,000 MW of natural gas capacity, which includes:
 - Refuel Boswell Unit 3 (355 MW) to operate on natural gas by 2030;
 - Add about 750 MW of additional natural gas generating capacity by 2035;
- Continue to develop refueling options for Boswell Unit 4 (585 MW) and revisit this issue in the Company's next IRP.

The merits of these actions will be addressed through written comments later this year. At this time, Staff brings the Commission the option to refer this case to the Office of Administrative Hearings (OAH) for the sole purpose of conducting one or more public meetings.

Unlike dockets such as rate cases or certificate of need proceedings, resource plans are generally not referred to the OAH for contested case proceedings; however, it has become more common that the Commission refer larger IRPs – for example, Xcel Energy's last two IRPs, and MP's last IRP – to OAH to oversee a series of public meetings. Once those are concluded, an Administrative Law Judge (ALJ) submits a written report.

The Commission has also required utilities to give written notice of a new resource plan to their customers. This often takes the form of directing the utility to distribute a bill insert and/or electronic notice; to develop an advertising plan; and to work with Staff before publishing or serving the notices. For example, in MP's last IRP, the Commission required the following:

1. Minnesota Power shall give notice of the 2021–2035 Integrated Resource Plan as follows:
 - a. Individual written notice to each customer in Minnesota, which may be in the form of a bill insert or electronic communication for customers with e-billing.
 - b. Written notice to the governing bodies of all municipalities, counties, local governing bodies, and Minnesota Tribal Nations in the Company's Minnesota service area.

- c. An advertisement plan for the Company's Minnesota service territory that may include social media, electronic, print, or other forms of public notice. Minnesota Power shall share this advertising plan with Commission staff no later than March 26, 2021 or provide staff an update if the plan is not complete by then.
2. Before publishing or serving the notices described above, Minnesota Power shall submit the draft notices for Commission approval. The Company shall submit draft notices to Commission staff no later than March 26, 2021.
3. The Commission delegates to the Executive Secretary the authority to approve customer notices, bill inserts, bill format, modify schedules, and any other communications for the duration of this proceeding.
4. This matter is referred to the Office of Administrative Hearings for the sole purpose of conducting one or more public meetings.
 - a. The written notice required in Ordering Point 1 shall include information about the public meetings, and notices shall be sent at least ten days before the first public meeting.
 - b. The Commission requests that the Office of Administrative Hearings provide a written summary of the public meetings within 60 days of the last public meeting.

Staff has not identified any issues that warrant new decision options beyond what the Commission required in MP's last IRP. Therefore, the decision options in these Briefing Papers are nearly identical to the Commission's Ordering Paragraphs listed above from MP's 2021 IRP.

2024-2025 STAKEHOLDER PROCESS

It is worth noting that MP engaged in a year-long stakeholder engagement process to inform the development of the 2025 Plan, similar to the stakeholder process the Company convened prior to filing its 2021 IRP. Participants represented various customer groups, environmental organizations, economic development entities, local government, industry, power plant host communities, and others.

The engagement process included three overlapping groups:

1. **The Engagement Group** convened four times to build a shared understanding of the policy, technology, and socio-economic landscape for the 2025 IRP.
2. **The Societal Advisory Group** was a subgroup of participants from the Engagement Group that convened three times to inform the development of a societal cost-benefit analysis (SCBA) for any Minnesota Power generation facility, including but not limited to Boswell Unit 4 and the Hibbard Renewable Energy Center (HREC).

3. **The Technical Advisory Group (TAG)** was another subgroup that convened regularly over several months to discuss modeling assumptions and methodologies for the IRP, as well as technical topics such as MISO's transmission planning process and seasonal resource adequacy construct.

More details on MP's stakeholder process and the feedback received will be provided in Appendix N, which MP will file by March 31.¹ The Commission may decide that the pre-filing stakeholder engagement process makes it less necessary to hold another series of public meetings. However, as the next section will discuss, Staff believes there is value in having a forum for members of the public to voice their concerns and priorities and learn about the IRP process and how to be involved.

DISCUSSION

Public Meetings

In MP's last IRP proceeding, the Commission's *Order Requiring Bill Insert and Referring Matter to OAH for Public Meetings* stated:

Public meetings provide a useful forum for gaining information and customer input about the potential resources being contemplated in Minnesota Power's resource plan. Therefore, the Commission will refer the matter to the OAH to convene one or more public meetings to inform the public about the plan and receive public comment. The Commission requests that the OAH provide a written summary of the public meetings within 60 days of the last public meeting. In addition, the Commission requests that the OAH facilitate full public participation to the extent practicable by accepting pre-recorded video and audio comments.²

Staff found these public meetings – which were all held virtually due to the ongoing COVID-19 pandemic – to be valuable. The meetings provided a forum for interested persons to gain information, an opportunity to provide input about potential resources being contemplated in MP's IRP, and enabled those potentially affected by the decision-making process to ask questions and hear the thoughts of others about the IRP. Therefore, Staff is supportive of referring this matter to OAH to convene one or more public meetings.

The Commission does not need to address how many public meetings should be convened or whether these should be held virtually or in-person, but of course, the Commission can guide the public meeting process in whatever manner it prefers. If the Commission does not specify a quantity or format for public meetings in its order, the ALJ assigned to the case will determine those matters in consultation with the utility, PUC Staff, and impacted intervenors.

¹ Minnesota Power, IRP Filing Update Letter, March 13, 2025

² Order Requiring Bill Insert and Referring Matter to OAH for Public Meetings, E-015/RP-21-33 at 3 (March 9, 2021) (eDocket No. 20213-171676-01).

Bill Insert and Electronic Notice

In MP's last IRP, as well as in Xcel's most recent IRP, the Commission directed the utility to send a bill insert or electronic notice to each of its Minnesota ratepayers. Such bill inserts and electronic notices typically include the following information:

1. A statement that the IRP has been filed;
2. A general description of the resource plan;
3. A general description of the Commission's role in resource planning;
4. Instructions on how to file public comments and attend any public meetings related to the resource plan;
5. Any other information that would assist ratepayers in understanding the IRP process.

In several recent cases, notices have also included a pre-addressed comment card to further streamline the input process.³

If the Commission requires Minnesota Power to send its customers an IRP-related bill insert or electronic notice, Staff recommends the content be reviewed by Commission staff and approved by the Executive Secretary before it is published. As with MP's last IRP, Staff suggests that draft notices be sent to Commission staff within approximately one month of the Agenda Meeting.

While the public may learn of the IRP through other means, Staff believes a bill insert and electronic notice has several advantages. Such notices provide neutral, vetted information, and would be sent to all Minnesota Power customers. Additionally, notices and bill inserts allow the Commission to ensure that customers have been advised on how to provide input directly to the Commission.

Staff recommends that physical bill inserts are sent to customers who pay their bills by mail; for customers who have opted into electronic bills, Staff recommends Minnesota Power provide notice to customers via email.

³ See for example: Minnesota Power's Notice of Rate Case Public Hearings, 2023 Rate Case, Docket E015/GR-23-155, March 21, 2024; and PUC Notice of Approval of Public Meeting Notice, Xcel 2024 Resource Plan, Docket E002/RP-24-67, March 29, 2024.

DECISION OPTIONS

Bill Insert and Electronic Notice

1. Minnesota Power shall give notice of the 2025–2039 Integrated Resource Plan as follows:
 - a. Individual written notice to each customer in Minnesota, which may be in the form of a bill insert or electronic communication for customers with e-billing.
 - b. Written notice to the governing bodies of all municipalities, counties, local governing bodies, and Minnesota Tribal Nations in the Company's Minnesota service area.
 - c. An advertisement plan for the Company's Minnesota service territory that may include social media, electronic, print, or other forms of public notice. Minnesota Power shall share this advertising plan with Commission staff no later than May 5, 2025, or provide staff an update if the plan is not complete by then.
2. Require the Company to submit a draft of each notice required above for Commission approval prior to publication or service. The Company shall submit draft notices to Commission staff no later than May 5, 2025.
3. Delegate to the Executive Secretary the authority to approve customer notices, bill inserts, bill format, modify schedules, and any other communications for the duration of this proceeding.

Public Meetings

4. Refer this case to the Office of Administrative Hearings for the sole purpose of conducting one or more public meetings.
 - a. The above-referenced customer notice shall include information about the public meetings, and notices shall be sent at least ten days before the first public meeting.
 - b. The Commission requests that the Office of Administrative Hearings provide a written summary of the public meetings within 60 days of the last public meeting.