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August 29, 2022

Mr. Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East Suite 350
St. Paul, MN 55101-2147

Re: Reply Comments of WPPI Energy
In the Matter of Minnesota Power's Application for Approval of its 2021 – 2035
Integrated Resource Plan
PUC Docket No. E015/RP-21-33

Dear Mr. Seuffert,

WPPI Energy ("WPPI") appreciates the opportunity to submit these Reply Comments on the 2021 – 2035 Integrated Resource Plan filed by Minnesota Power. WPPI Energy was formed in 1980 as a joint action agency and currently serves 51 customer-owned electric utilities in Wisconsin, Michigan, and Iowa. These utilities purchase their electrical requirements from WPPI and supply power to more than 200,000 homes and businesses. WPPI has a peak demand of approximately 1000 MW and an annual energy requirement of approximately 5 million MWh. WPPI has a diverse portfolio of power supply resources in terms of fuel type (coal, natural gas, nuclear, wind, and solar), location (Illinois, Iowa, Minnesota, and Wisconsin), and both owned by WPPI and power purchased from other entities. This diverse portfolio includes a share of Unit 4 of the Boswell Energy Center ("Unit 4").

In 1990, WPPI acquired its first owned generating resource, with the purchase of a 20 percent interest in Unit 4. Over the subsequent 32 years, WPPI and Minnesota Power have maintained a strong partnership that has allowed Unit 4 to remain a valuable resource for both utilities in a changing market and regulatory environment. WPPI, along with Minnesota Power, has made substantial investments to improve the unit's efficiency, flexibility and environmental performance. While WPPI has significantly expanded its portfolio of power supply resources in the years since the acquisition of its interest in Unit 4, the unit continues to play an important role in WPPI's power supply portfolio, providing reliable and affordable on-demand energy to serve our members and their retail customers. Like most utilities, WPPI's power supply portfolio has transitioned in recent years, with the addition of significant renewable and other carbon-free resources. Since 2005, carbon dioxide emissions associated with WPPI's power supply to its members has been reduced by nearly 40 percent, and WPPI has set a goal of a 100 percent carbon-free power supply by 2050. Reaching this goal, however, will depend upon the availability of generating resources capable of providing the reliable, affordable, on-demand power

currently provided by resources like Unit 4. WPPI looks forward to continuing to work with Minnesota Power to ensure a future for Unit 4 that best meets the needs and goals of both parties.

Sincerely,

A handwritten signature in blue ink that reads "Andy Kellen". The signature is written in a cursive style with a large initial 'A'.

Andy Kellen
Vice President – Power Supply Resources

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

*In the Matter of Minnesota Power's
Application for Approval of its 2021 –
2035 Integrated Resource Plan*

) Docket No. E015/RP-21-33
)
) ***CERTIFICATE OF SERVICE***
)

The undersigned hereby certifies that a true and correct copy of **Reply Comments of WPPI Energy** has been served today by e-mail and/or U.S. Mail to the following:

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Dated this 29th day of August, 2022

/s/ Cori M. Mathews

Cori M. Mathews