

February 24, 2025

VIA ELECTRONIC FILING

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

Re: In the Matter of a Petition for Approval of Investments and Expenditures in the Regal Solar and Boswell Solar Projects for Recovery through Minnesota Power's Renewable Resource Rider under Minn. Stat. 216B.1645 and Related Tariff Modifications

Dear Mr. Seuffert,

Clean Energy Economy Minnesota (CEEM) respectfully submits these comments for PUC Docket Number E015/M-24-343 and E015/M-24-344 in the Matter of a Petition for Approval of Investments and Expenditures in the Regal Solar and Boswell Solar Projects for recovery through Minnesota Power's Renewable Resource Rider under Minn. Stat. 216B.1645 and related tariff modifications.

Our mission at CEEM is to provide educational leadership, collaboration, and policy analysis that accelerates clean energy market growth and smart energy policies. We work to support and expand clean energy jobs and the economic opportunities provided by clean, reliable, and affordable energy on behalf of all Minnesotans.

Please feel free to contact us with any questions that you may have. We hope that the comments below provide you with useful insights.

Regards,



George Damian
Director of Government Affairs
gdamian@cleanenergyeconomymn.org

State of Minnesota
Before the
Minnesota Public Utilities Commission

Katie Sieben
Joseph K. Sullivan
Hwikwon Ham
Audrey Partridge
John Tuma

Chair
Vice-Chair
Commissioner
Commissioner
Commissioner

In the Matter of a Petition for Approval
of Investments and Expenditures in the
Regal Solar Project for Recovery through
Minnesota Power's Renewable Resource
Rider under Minn. Stat. 216B.1645 and
Related Tariff Modifications

CLEAN ENERGY ECONOMY
MINNESOTA'S

COMMENTS

PUC Docket Numbers: E015/M-24-343

and

E015/M-24-344

In the Matter of a Petition for Approval
of Investments and Expenditures in the
Boswell Solar Project for Recovery
through Minnesota Power's Renewable
Resource Rider under Minn. Stat.
216B.1645 and Related Tariff
Modifications

INTRODUCTION

Clean Energy Economy Minnesota

Clean Energy Economy Minnesota ("CEEM") is an industry led, nonpartisan, non-profit organization representing the business voice of energy efficiency and clean renewable energy in Minnesota.

Our work is focused on educating Minnesotans about the economic benefits of transitioning to a clean energy economy. Our business membership consists of over 60 clean energy companies ranging from start-up businesses to Fortune 100 and 500 corporations that employ tens of thousands of Minnesotans across the state. Together

with our members, we stand committed to delivering a 100% clean energy future where all Minnesota businesses and citizens will thrive.

CEEM respectfully submits these Comments in response to the Minnesota Public Utilities Commission's (the "Commission") December 4, 2024, Notice of Extended Comment Period for the Regal and Boswell Solar Project matters.

COMMENTS

Based on the rationale set forth below, CEEM supports the approval of investments and expenditures, consistent with the applicable Minnesota law, to develop both the Regal Solar Project and the Boswell Solar Project.

Jobs and the Economy

Given the publically available information in Minnesota Power's petitions for approval, the Regal and Boswell Solar Projects hold potential to generate jobs, economic development, and electricity from clean, renewable energy via solar arrays.¹

According to Minnesota Power, "About 100 jobs, and 150 jobs at peak of construction" will be tied to the Regal Solar Project.² CEEM applauds Minnesota Power for taking the next step to further transition from using fossil fuels to using clean renewable energy while providing local jobs with the Regal and Boswell Solar Projects.

On a macro economic level, these projects will have a large, positive impact. The 85 megawatt Boswell Solar Project has an estimated construction cost of approximately \$164 million.³ Minnesota Power estimates the project will provide \$319,000 in annual

¹ Minnesota Power, Petition for Approval, *Re: In the Matter of the Petition of Minnesota Power for Approval of Investments and Expenditures in the Regal Solar Project for Recovery through Minnesota Power's Renewable Resources Rider under Minn. Stat. § 216B.1645 Docket No. E015/M-24-343*, November 13, 2024 [hereinafter "Regal Petition"], at 13 (describing the "Socioeconomic Impact") and at 1 (describing the facility and capacity). See, also, Minnesota Power, Petition for Approval, *Re: In the Matter of the Petition of Minnesota Power for Approval of Investments and Expenditures in the Boswell Solar Project for Recovery through Minnesota Power's Renewable Resources Rider under Minn. Stat. § 216B.1645 Docket No. E015/M-24-344*, November 13, 2024 [hereinafter "Boswell Petition"], at 14 (describing the "Socioeconomic Impact") and at 3 (describing the facility and capacity).

² Minnesota Power, *Regal Solar Project Information Sheet*, 1 (February 2025) (including reference to EnergyForward, mnpower.com/EnergyForward, at <https://mnpower.com/energyforward>, wherein Minnesota Power sets forth its vision on its "commitment to climate, customers and communities").

³ Boswell Petition, at 14.

local tax revenue and add \$1.26 million to the 2028 Gross Regional Product.⁴

The socioeconomic impact for the Regal Solar Project, according to Minnesota Power, is expected to be larger than Boswell. The estimated annual local tax revenue for the 119.5 MW⁵, \$238 million Regal Project is \$395,000.⁶ Minnesota Power estimates the project will add \$2 million to the 2028 Gross Regional Product.⁷

Overall, the Regal and Boswell projects are anticipated to provide local jobs and boost the economy. A temporary local loss of revenue or jobs linked to, for instance, the Boswell Energy Center⁸ make the area a candidate ripe for additional economic development. For some broader context, it must be noted that the failure to rapidly reduce climate altering Greenhouse Gas (GHG) emissions is taking an even larger personal and economic toll on individuals and families across Minnesota and the Nation. The economic losses and damages caused by climate change is becoming so massive, in the billions of dollars, that insurance companies are raising premiums by significant amounts and actually exiting some markets.⁹

That said, the totality of the Regal and Boswell Solar Projects involve tangible financial investments that are anticipated to provide local jobs as well as local and regional economic development. For these jobs and economic reasons, CEEM supports the Regal and Boswell Solar Projects.

⁴ *Id.*

⁵ Regal Petition, at 8.

⁶ *Id.* at 13.

⁷ *Id.*

⁸ Minnesota Public Utilities Commission, Docket 24-343, Document ID 20252-215361-01, Mayor Josh Casper, City of Cohasset, Minnesota, 1 (February 13, 2025).

⁹ See, e.g., Scientific American, *Climate Change is Destabilizing Insurance Industry*, (March 23, 2023), <https://www.scientificamerican.com/article/climate-change-is-destabilizing-insurance-industry/> (raising premiums, pulling out of markets); see, also, Council on Foreign Relations, *Climate Change and U.S. Property Insurance: A Stormy Mix*, (August 17, 2023), <https://www.cfr.org/article/climate-change-and-us-property-insurance-stormy-mix> (explaining the linkage between fossil fuel use and climate change and the damage and ongoing threats to people and property); and State of Minnesota, *Minnesota's Climate Action Framework*, <https://climate.state.mn.us/sites/climate-action/files/Climate%20Action%20Framework.pdf> (last visited February 21, 2025) (presenting the science around climate change and outlining the present and future harms to Minnesotans).

Role of Renewable Energy - Regal and Boswell Solar Projects

With respect to the generation of electricity from clean, renewable solar energy, the Regal and Boswell Solar Projects will indeed be positive steps in decarbonizing another portion of the electricity sector.

While Minnesota Power's petition for approval of the two dockets at issue here stem from the Commission's January 9, 2023, Order,¹⁰ the Regal and Boswell Solar Projects should also be considered in light of the larger clean, renewable energy context in Minnesota: the Carbon-Free Standard.

In accordance with Minnesota Law, utilities are required to generate electricity from carbon-free energy technology by 2040.

Each electric utility must generate or procure sufficient electricity generated from a carbon-free energy technology to provide the electric utility's retail customers in Minnesota, or the retail customers of a distribution utility to which the electric utility provides wholesale electric service, so that the electric utility generates or procures an amount of electricity from carbon-free energy technologies that is equivalent to at least the following standard percentages of the electric utility's total retail electric sales to retail customers in Minnesota by the end of the year indicated:

- (1) 2030 80 percent for public utilities; 60 percent for other electric utilities
- (2) 2035 90 percent for all electric utilities
- (3) 2040 100 percent for all electric utilities.¹¹

With 15 years remaining to meet the requirements in the Carbon-free Standard, the Regal and Boswell Solar Projects are indeed a step in the correct direction for Minnesota Power as it works to comply with the law. At the same time, the use of clean, zero cost

¹⁰ Minnesota Public Utilities Commission, *In the Matter of Minnesota Power's 2021-2035 Integrated Resource Plan, Order Approving Plan and Setting Additional Requirements*, January 9, 2023 [hereinafter "Order"].

¹¹ Minn. Stat. § 216B.1691, Subd. 2g. (2024) (setting forth year and percentage requirements in the standard).

solar energy and the concomitant tangible reduction in GHG emissions can yield benefits for Minnesota Power, its customers¹² and, with emission reductions, all Minnesotans.

The Commission's Order at issue here includes a number of requirements for Minnesota Power. In particular, the Order requires Minnesota Power "to meet its customer and renewable product needs between 2025 and 2030 by:" ... "b. Acquiring up to 300 MW of regional/in-service territory or net-zero solar and implementing storage demonstration projects of at least 100 MWh and up to 500 MWh by 2026, as practicable".¹³

Based on Minnesota Power's Petitions, the Regal and Boswell Solar Projects will use clean, renewable solar energy to add thousands of megawatt hours of electricity to the grid. The Regal Solar Project is anticipated to add approximately 242,000 MWh of renewable energy to the grid¹⁴ and the Boswell Solar Projects is anticipated to add 166,000 MWh¹⁵ to the grid. For these tangible clean renewable energy reasons, CEEM supports the Regal and Boswell Solar Projects.

CONCLUSION

Given the facts in the record, the Regal and Boswell Solar Projects hold solid potential to provide local jobs, boost the local economy, and use clean, renewable solar energy. These projects can aid Minnesota Power in fulfilling its vision to transition from using fossil fuels to instead using clean renewable energy to generate electricity. For Minnesota Power and Minnesotans to capture the potential socioeconomic and environmental benefits from these two projects, CEEM supports the approval of investments and expenditures, consistent with the applicable Minnesota law, to develop both the Regal Solar Project and the Boswell Solar Project.

¹² Minnesota Power, *EnergyForward: Our Energy Vision is Your Carbon-Free Future* at <https://mnpower.com/energyforward> (last visited February 21, 2025) (stating: "Our bold vision centers on our commitment to climate, customers and communities. We're a clean-energy leader under our EnergyForward strategy, already delivering 50% renewable energy ahead of all other Minnesota utilities. Now we're doubling down on that with a vision to deliver 100% carbon-free energy to customers reliably and in the most affordable ways.").

¹³ Order, at 13.

¹⁴ Regal Petition, at 8.

¹⁵ Boswell Petition, at 9.