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June 16th, 2025

- Via Electronic Filing –

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

Re: Request for One-Year Extension of Great River Energy's Next Integrated Resource Plan Filing. Docket No. ET2-RP-22-75

Dear Mr. Seuffert:

Great River Energy (GRE), a not-for-profit electric cooperative serving 26 member-owner distribution cooperatives across Minnesota, respectfully requests a one-year extension for the filing of its next Integrated Resource Plan (IRP), currently due on **April 1, 2026**, to **April 1, 2027**.

GRE remains committed to providing a comprehensive, forward-looking IRP that meets the statutory and regulatory requirements of the Commission and supports reliable, affordable, and sustainable service for our member-owners. However, a convergence of significant external uncertainties makes it prudent to request additional time to develop a plan that accurately reflects the rapidly evolving energy, policy, and economic landscape. The additional year will allow us to better respond to the following key issues:

1. **Federal Policy Uncertainty:**
   The outcome of the 2024 presidential election and the transition to a new federal administration have created material uncertainty around key energy incentives, including the Production Tax Credit (PTC) and Investment Tax Credit (ITC). Additionally, trade policy developments, particularly new or expanded tariffs, could significantly alter project economics. These uncertainties have delayed GRE's ability to receive accurate resource cost information from current manufacturers and developers. In addition, indicative discussion from all technology providers confirms that current sources for resource pricing, such as NREL and the EIA, are significantly outdated and lower than what today's market is supporting. We anticipate further federal guidance or legislative developments over the next year that would meaningfully affect our resource planning decisions.

2. **Load Growth Uncertainty Driven by Large Interconnection Requests:**
   GRE is currently assessing several large load interconnection requests, primarily from data centers, within our member service territory. These projects could represent unprecedented and rapid increases in load. While uncertainty is inherent in forecasting, the current variability in potential outcomes is unusually wide. Additional time will allow us to refine our near-term load forecasts and develop sensitivities around our Preferred Plan that reflect a more accurate range of outcomes over the ensuing five years.

3. **State Policy Uncertainty Regarding Large Load Development:**
   The Minnesota Legislature is actively considering new regulations that could affect large energy users such as data centers. These regulations may impact possible energy efficiency requirements, emissions, noise abatement, and/or renewable procurement requirements. The potential for new statutory obligations or permitting frameworks in the 2025 legislative session adds another layer of uncertainty that will materially influence GRE's long-term planning and the feasibility of certain large load interconnection requests. Additional time will allow us to better incorporate the outcome of these legislative efforts into our IRP.

4. **Compliance with the Carbon Free Standard (CFS):**
   GRE awaits further guidance from the Commission on how to demonstrate compliance with Minnesota's Carbon Free Standard. Specifically, clarity is needed on how to model compliance obligations in our resource optimization tools and whether that involves annual or hourly Renewable Energy Credit (REC) matching, or other decarbonization metrics. Without this guidance, our ability to produce a meaningful and compliant IRP is hindered.

5. **Empowering Rural America (New ERA) Program Considerations:**
   Finally, GRE is monitoring the implementation of the Department of Energy's New ERA program and its potential implications for resource costs, funding availability, and carbon-free technology options. While not the primary driver of this request, the evolving nature of this program reinforces the need for additional time to evaluate its integration into GRE's planning framework.

GRE recognizes the Commission's commitment to ensuring timely and transparent resource planning by Minnesota utilities and appreciates your consideration of this request. As you are aware, forecasting and modeling assumptions need to be set many months before the full IRP can be modeled and assembled. During GRE's 2023-2037 resource planning process, many Information Requests and intervener comments focused on the fact that between the time the GRE's IRP was submitted and the final Commission Order, several of these assumptions were considered outdated. With the additional uncertainties stated above, this timing issue is likely to be more prevalent thus requiring update modeling requests and amendments to GRE's Preferred Plan after completion of our next IRP and prior to the Commission's final Order. We believe that granting a one-year extension will ultimately support a more accurate, thoughtful, and actionable IRP that aligns with Minnesota's energy policy goals while ensuring reliability and affordability for our members.

Please do not hesitate to contact us with any questions or if further information is needed. Thank you for your consideration.
Respectfully Submitted.

GREAT RIVER ENERGY
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Cc: Service List