



Emily Larson
Mayor

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June 10, 2021

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

Re: Minnesota Power's Application for Approval of its 2021-2035 Integrated Resource Plan, Docket No. E015/RP-21-33

Dear Mr. Seuffert,

As an engaged community that cares about the climate crisis, we are grateful for the chance to submit comments on Minnesota Power's Integrated Resources Plan, submitted February 1, 2021.

Our City cares about climate change: we have climate goals and engaged citizens.

Beginning in 2016, the City of Duluth pledged to commit to efforts to meet the climate crisis. We have committed to reducing greenhouse gas emissions by 80% by 2050, and have nearly 20% reduction of City emissions since 2017. Three years ago, we created the Energy Plan Commission to guide our energy reduction efforts. We pledged to convert our coal-powered Steam Plant to reduce pollution and reduce waste. In April 2021, the City Council unanimously passed a Climate Emergency Resolution, which challenges us to take urgent action, exceed our goals for both City and community greenhouse gas emission reduction. Members of our community are active in energy and climate issues, and they recently created a Duluth Citizens' Climate Action Plan.

We support the direction of Minnesota Power's IRP.

In particular, we fully support Minnesota Power's commitment to:

- 80% carbon reduction by 2035
- 100% carbon reduction by 2050
- A large increase in renewable energy: including 400 MW of new renewable resources, including some local generation.
- Coal plant retirements, including no more coal after 2035 in Minnesota Power operations/facilities through:
 - Retiring the currently-idled Taconite Harbor Energy Center in September 2021
 - Transitioning to economic dispatch in 2021 of coal at Boswell Energy Center Unit 3
 - Preparing Unit 4 to transition to future economic dispatch
- Energy efficiency and grid flexibility programs:
 - Including continuation of energy efficiency programs
 - Investment in additional demand response

We would like accelerated deployment of renewables and retirement of fossil fuels, wherever possible, and an emphasis on equity and environmental justice.

We support the Commission in approving Minnesota Power's 2021 Integrated Resource Plan, with the modification that the investment in renewables and the retirement of fossil fuel infrastructure be accelerated and prioritized, wherever possible. In addition, for the next Minnesota Power IRP, we urge the Commission to require Minnesota Power to provide details on technology updates related to utility-scale storage and the elimination of fossil fuel infrastructure. We would also like the next IRP process to emphasize equity and environmental justice in both programming and leadership, as electricity generation has been a major source of air pollution historically in Minnesota, where low-income and communities of color have been disproportionately exposed to pollutants that harm human health.

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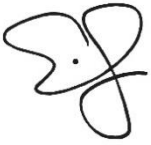
We want to be a collaborator on energy transition.

City staff are willing and look forward to working in collaboration on opportunities to participate in conservation programs and renewable energy development. Potential collaborations could include:

- Additional Community Solar Garden (CSG) siting and expand access of subscriptions for residential customers. We would like to be a partner in finding/re-using suitable land sites and as an anchor institution for future CSGs.
- Distributed Energy Resources demonstration projects.
- Storage. Although energy storage is not proposed at a utility scale, as a demand-management strategy, the City would like to collaborate on research and development of microgrids, particularly for community resiliency applications (ex: public-serving functions).
- Partnering to improve equity in planning and programs, including multi-family conservation programs and accessibility of Electric Vehicles and solar infrastructure to low-middle income households.

Thank you for your consideration.

Sincerely,



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