

**In the Matter of Great River Energy's 2022-2036 Resource Plan**

**Comments on Request for Extension**

**PUC Docket Number: E2/RP-17-286**

LIUNA Minnesota & North Dakota appreciates the opportunity to offer reply comments in support of the request by Great River Energy ("GRE") to move the due date for filing the company's next Integrated Resource Plan ("IRP") to April 1, 2023. We strongly believe that the delay will support development of a robust record that contains the most accurate and up-to-date information covering GRE's current operations and plans.

GRE is in the midst of finalizing profound changes to the company's generation and transmission portfolio, including the sale of GRE's last remaining coal-fired power plant and associated HVDC transmission line, and acquisition of more than 1,000 megawatts of wind generation. As explained in GRE's request, these changes could cause shifts to other aspects of the utility's business, including load associated with fixed obligation member contracts.

We are concerned that an IRP filed on April 1 could contain outdated information, analysis of which would be a poor use of time for Department of Commerce and Commission staff, and for stakeholders such as LIUNA that are already struggling to cover similar proceedings including but not limited to the Minnesota Power and Otter Tail Power IRPs. We are also concerned that, rather than providing transparency, moving forward while important elements of the plan remain in play will create public confusion and undermine confidence in the process.

Customers have been well-served by recent changes GRE has made to its generation mix, which are allowing the utility to reduce its carbon footprint without raising costs for member cooperatives (see recent Energy News Network coverage here: <https://minnesotareformer.com/2022/01/27/a-minnesota-co-op-credits-clean-energy-transition-for-stabilizing-wholesale-rates/>). GRE should be given the opportunity to finalize these changes and file an IRP that reflects the utility's current direction, allowing the Commission, staff and stakeholders to focus on other pressing matters before us.

Dated: February 18, 2022

Respectfully Submitted,  
LIUNA Minnesota & North Dakota

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