

July 8, 2025

Executive Secretary  
MN Public Utilities Commission  
121 7<sup>th</sup> Place East  
Suite 350  
St. Paul, MN 55101

Re: **IN THE MATTER OF SOUTHERN MINNESOTA MUNICIPAL POWER AGENCY'S  
2025–2039 INTEGRATED RESOURCE PLAN: DOCKET NO. ET9/RP-24-356**

Dear Executive Secretary:

The enclosed document contains Southern Minnesota Municipal Power Agency's comments in response to the Public Utilities Commission's June 27, 2025 Information Request No. 1 in the above referenced docket.

This document has been filed by e-filing with Minnesota Public Utilities Commission on July 8, 2025, as shown in the attached Certificate of Service.

If you have any questions, please contact me at (507) 292-6460.

Sincerely,



Jeremy Sutton  
Director of Operations and COO

Attachments

cc: Dave Geschwind

JBS:jh

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

Katie Sieben	Chair
Joseph Sullivan	Vice-chair
Hwikwon Ham	Commissioner
Audrey Partridge	Commissioner
John Tuma	Commissioner

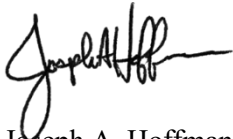
In the Matter of Southern Minnesota Municipal Power Agency's 2025-2039 Resource Plan  
Docket No. ET9/RP-24-356

**Southern Minnesota Municipal Power Agency's comments in response to the Public Utilities Commission's June 27, 2025 Information Request No. 1 in the above referenced docket.**

**CERTIFICATE OF SERVICE**

I, Joseph A. Hoffman, hereby certify that I have this day served a copy of the following, or a summary thereof, on the Executive Secretary of the Public Utilities Commission and Sharon Ferguson by e-filing and First Class mail, and to all other persons on the attached service list by electronic service or by First Class mail.

Dated this 8<sup>th</sup> day of **July, 2025**



Joseph A. Hoffman  
Chief External Affairs Officer  
Southern Minnesota Municipal Power Agency  
507-292-6427

Official Service List  
Southern Minnesota Municipal Power Agency  
2025-2039 Integrated Resource Plan  
Docket No. ET9/RP-24-356

Last Name	First Name	Email	Company Name	Delivery Method	View Trade Secret
Commerce Attorneys	Generic	commerce.attorneys@ag.state.mn.us	Office of the Attorney General - Department of Commerce	Electronic Service	Yes
Ferguson	Sharon	sharon.ferguson@state.mn.us	Department of Commerce	Electronic Service	No
Hoffman	Joe	ja.hoffman@smmpa.org	SMMPA	Electronic Service	No
Residential Utilities Division	Generic Notice	residential.utilities@ag.state.mn.us	Office of the Attorney General - Residential Utilities Division	Electronic Service	Yes
Seuffert	Will	will.seuffert@state.mn.us	Public Utilities Commission	Electronic Service	Yes
Sutton	Jeremy	jb.sutton@smmpa.org	Southern MN Municipal Power Agency	Electronic Service	No

STATE OF MINNESOTA  
BEFORE THE  
MINNESOTA PUBLIC UTILITIES COMMISSION

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

Chair  
Commissioner  
Commissioner  
Commissioner  
Commissioner

In the Matter of Southern Minnesota Municipal  
Power Agency's 2025-2039 Resource Plan

Docket No. ET9/RP-24-356  
Comments of  
Southern Minnesota Municipal  
Power Agency

INTRODUCTION

Southern Minnesota Municipal Power Agency (SMMPA) offers these comments in response to the Public Utilities Commission's June 27, 2025 Information Request No. 1.

SMMPA is a not-for-profit joint-action agency (municipal power agency) that provides wholesale energy, transmission service, and other energy-related services to 17 municipally-owned utilities located across the State of Minnesota.

COMMENTS

In its June 27, 2025 filing, the Public Utilities Commission requested updated charts and tables on how Austin Utilities' extension of its power sales contract affects SMMPA's IRP.

*MPUC Request No. 1*

*In various instances in the Agency's initial IRP filing, SMMPA noted that subsequent to its Aurora modeling, Austin Utilities and SMMPA agreed to extend its power sales agreement to 2050. However, some of the tables and figures within the petition reflect the agreement not being in place. Therefore, Commission Staff requests SMMPA provide a response with the following tables and figures updated to reflect the additional Austin load:*

- *Table 3-6: Base Case Net IMS Energy and Peak Demand*
- *Chart 8-1: Resource and Capacity Requirements – Before Additions*
- *Chart 8-2: Resource and Capacity Requirements – Preferred Plan*
- *Table 9.2: Percent Carbon Free – Generation and Load*

On the following pages please find SMMPA's response to this request which includes updated Table 3-6, Chart 8-1, Chart 8-1, and Table 9.2.

Table 3.6: Base Case Net IMS Energy and Peak Demand

**Table 3.6**  
**Base Case Net IMS Energy and Peak Demand**  
**(Includes Austin Utilities)**

	Energy (MWh)	Peak Demand (MW)
2024	2,918,185	561.5
2025	2,917,574	563.1
2026	2,926,402	564.2
2027	2,937,258	565.5
2028	2,954,947	566.4
2029	2,961,304	568.1
2030	2,036,533	353.1
2031	1,752,171	354.1
2032	1,758,990	354.5
2033	1,760,700	356.0
2034	1,764,722	356.9
2035	1,768,575	357.6
2036	1,774,308	357.5
2037	1,775,658	359.1
2038	1,778,817	359.8
Compound Avg. Growth Rates:		
2024-2029	0.3%	0.2%
2031-2038	0.2%	0.2%

Chart 8-1  
Resource and Capacity Requirements – Before Additions (Includes Austin Utilities)

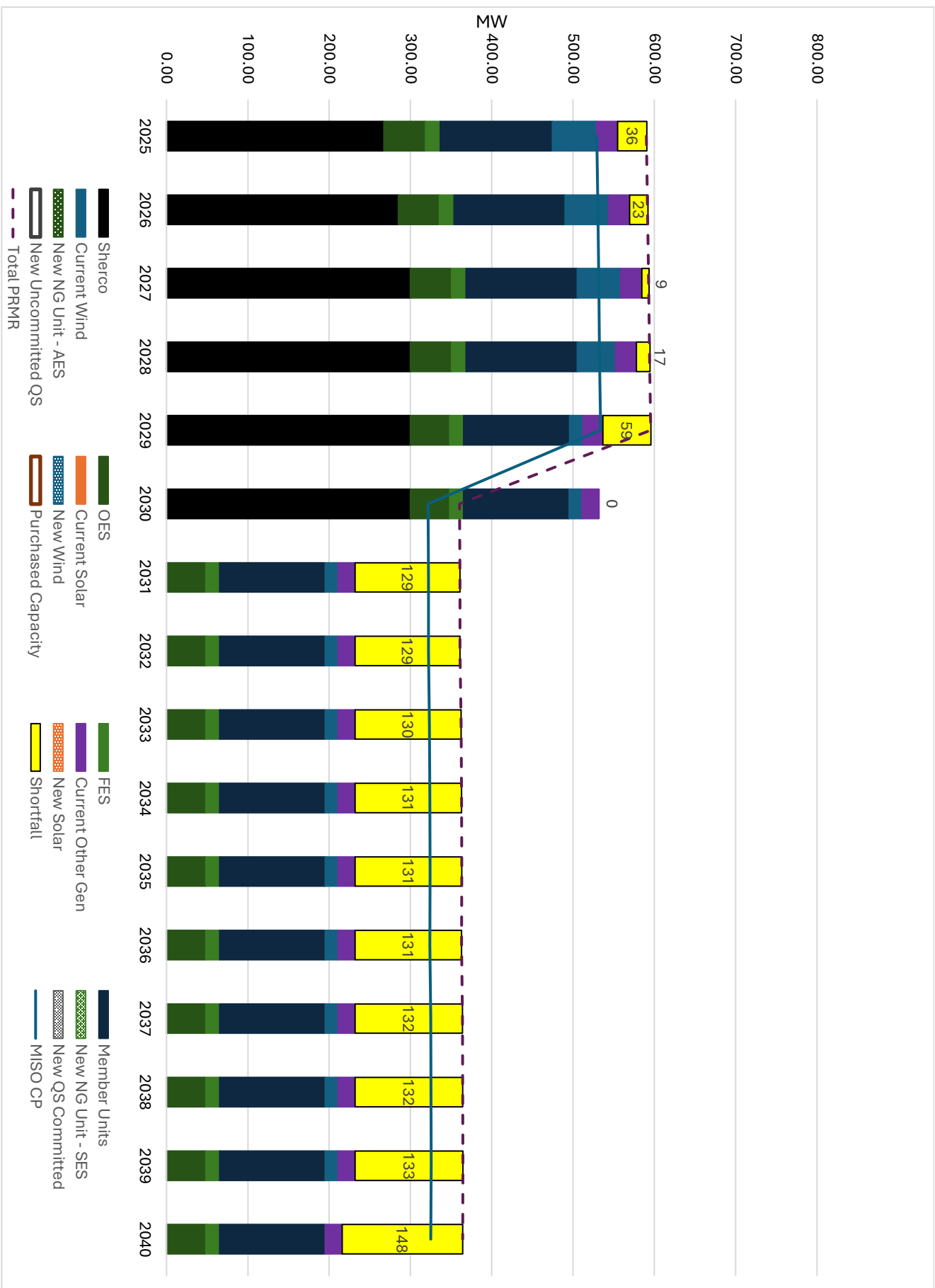


Chart 8-2  
Resource and Capacity Requirements – Preferred Plan (Includes Austin Utilities)

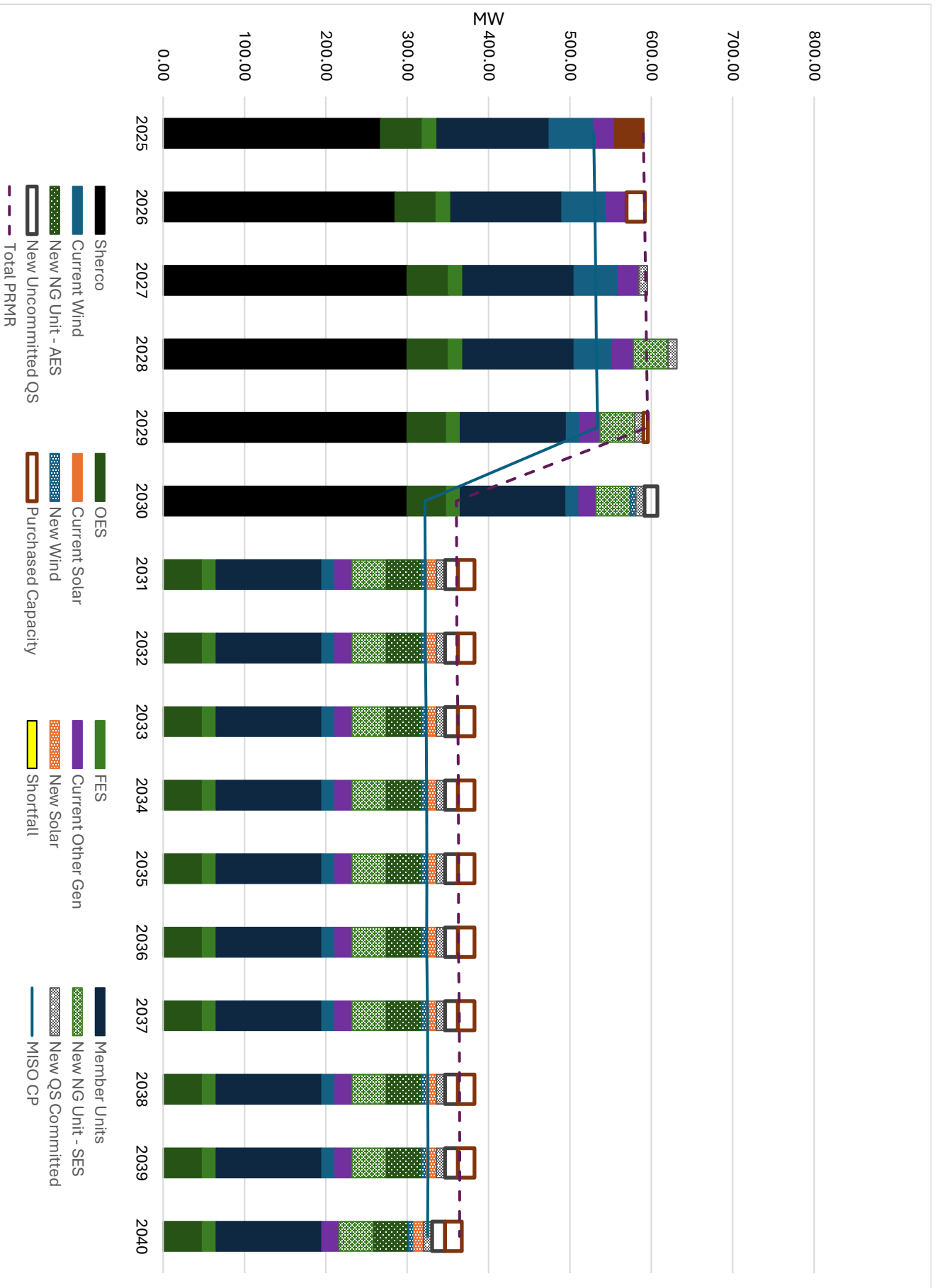


Table 9.2: Percent Carbon Free – Generation and Load

**Table 9.2**  
**Percent Carbon Free – Generation and Load**  
**(Includes Austin Utilities)**

<b>Year</b>	<b>Carbon Based Generation (MWh)</b>	<b>Carbon Free Generation (MWh)</b>	<b>Percent of Generation Carbon Free</b>	<b>Customer Load (MWh)</b>	<b>Percent Load Carbon Free</b>
2025	1,950,388.49	787,479.12	29%	2,895,638	27%
2026	1,612,212.19	787,535.28	33%	2,903,677	27%
2027	1,912,410.60	787,548.55	29%	2,912,015	27%
2028	1,919,259.93	791,099.94	29%	2,927,356	27%
2029	1,722,449.10	557,767.19	24%	2,931,745	19%
2030	1,926,080.34	803,113.23	29%	2,014,691	40%
2031	94,553.47	1,455,134.83	94%	1,731,249	84%
2032	76,790.14	1,459,865.12	95%	1,736,292	84%
2033	53,041.35	1,447,211.72	96%	1,736,228	83%
2034	65,655.95	1,448,205.71	96%	1,738,594	83%
2035	76,814.74	1,448,197.58	95%	1,740,732	83%
2036	80,216.42	1,451,326.90	95%	1,744,692	83%
2037	80,265.51	1,439,252.46	95%	1,744,193	83%
2038	77,914.79	1,439,304.05	95%	1,745,464	82%
2039	68,650.94	1,439,699.27	95%	1,746,817	82%



## CONCLUSION

SMMPA appreciates the opportunity to provide these updated charts and tables to the Commission regarding the Agency's 2025-2039 Integrated Resource Plan.

Date: July 8, 2025

Southern Minnesota Municipal Power Agency