

Re: Docket 22-75, GRE IRP extension request

Dear Commissioners,

I write as a member-owner of the Cooperative Light & Power (formerly The Cooperative Light and Power Association of Lake County), itself a member-owner of the Great River Energy cooperative.

The Department of Commerce has recommended a 15-month extension to GRE's IRP deadline.

I of course agree with the Department that having accurate inputs to an integrated resource plan is important; however, the Department does not offer any specifics as to why it believes inputs would be more accurate after a 15 month delay beyond reliance upon GRE's own claims (which did not offer any specifics either). All that a 15 month delay would likely accomplish, according to information in the record so far, is a 15 month delay.

The Department draws particular attention to the existing IRP's resource acquisitions in the 2030-32 period of storage, solar and wind to replace the expiring 350MW PPA with Rainbow.

There are two important recent developments relevant to this trifecta of new resources.

Firstly, the results of [the PY25-26 MISO planning resource auction](#) this spring with its unprecedented \$666.50/MW-day pricing of summer capacity. GRE made bank from this with being able to sell approximately 100MW of accredited capacity.

A notable change to the market was the inclusion of valuing excess capacity on a curve per the recommendation of MISO's Independent Market Monitor which they had been making every year since 2011. I imagine that with a pricing curve such prices will generally be more stable than they have been before, with MISO's capacity auctions historically giving prices that were either on the floor or ceiling and rarely anything in between.

I would value hearing GRE's thoughts on that matter sooner rather than later, especially since if summer capacity values remain anywhere near this value they will have a very significant incentive to bring forward their current 2030 storage and/or 2031 solar resource plans and a dramatic foreshortening of the time between IRP and resource acquisition would be on the table. Doubly so if a 15 month extension is granted.

Secondly, GRE has planned 140MW of battery storage as the Emmons-Logan Energy Storage Project in North Dakota, which [is currently slated for commercial operation at the end of 2026](#), and as yet absent from this docket.

An IRP that is not released until July 2027 per the Department's recommendation will have these important developments in the rear-view mirror.

Within this docket and since the Commission accepted the existing IRP, GRE has notified the Commission of:

- The June 2024 cancellation of the Discovery wind PPA (400MW, which had been slated for 2026).
- The December 2024 extension of the Prairie Star wind PPA (100MW, effective 2027).
- The January 2025 PPA for Big Bend wind (300MW, anticipated 2028).
- The February 2025 PPA for Red Butte wind (426MW, anticipated 2028).

While obviously GRE had to adapt to the loss of the 400MW Discovery PPA (and I am glad for their prompt exercise of hedges there), the wind resources contracted since are 426MW in excess of that and of a magnitude not envisaged by the current IRP before 2032. It is not in the record whether this was to satisfy demand growth beyond the current IRP's projections or if Red Butte represents the same 400MW wind resource originally slated for 2032, perhaps due to a window of favorable economic circumstances.

GRE is making significant planning decisions within the current environment of uncertainty that it and the Department both claim must be given time to settle before resource planning can be performed with a semblance of reliability. Which rather undermines the entire rationale provided for the extension request.

Should Commissioners see fit to grant an extension then it is surely essential to follow CURE's recommendation of requiring an Interim IRP to be filed on the original timeline for a full one (i.e. by April 2026). To have nothing before July 2027 would be absurd.

Yours sincerely,

Geoffrey P. Tolley
Two Harbors, MN 55616