

Comments from International Union of Operating Engineers Local 49

July 19, 2024

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

RE: In the Matter of the Commission Investigation into Gas Utility Resource Planning (23-117)

Dear Mr. Seuffert,

Thank you for the opportunity to submit reply comments for gas utility resource planning. We appreciate the opportunity to reply to the straw proposals and initial comments submitted by the parties.

As a threshold issue, we continue to encourage the Commission to take a flexible approach to the initial gas resource plans submitted by the natural gas utilities. As the Commission is aware, these plans will be new to the utilities, stakeholders, and the Commission. As such, the Commission should avoid being overly prescriptive in setting out the requirements. We anticipate that gas resource planning will be an iterative process with the opportunity to adjust requirements as needed over subsequent resource planning rounds.

In setting the requirements for the expansion alternatives analysis, we encourage the Commission to not require an overly complex screening process and instead set a reasonable threshold level that allows for 2-3 projects to be analyzed using the expansion alternatives analysis. This could mean that different utilities use different thresholds based on size and number of expected projects over a certain cost.

Lastly, as has been previously discussed, while the Commission should consider how different expansion alternatives advance state goals—including climate goals, the state's natural gas utilities are not under a mandate to achieve specific carbon reduction targets. We continue to believe that there remains a range of potential approaches to achieve carbon reductions in the natural gas sector and would encourage the Commission to avoid adopting a process that presumes one approach is the correct one and evaluates resources plans based on whether or not they adhere to that approach.

Thank you for the opportunity to provide comments and we appreciate the ongoing discussions with other stakeholders as we shape this process.

Sincerely,

Nathan Runke, Regulatory and Political Affairs Coordinator, International Union of Operating Engineers Local 49