



February 4, 2025

Via Electronic Filing

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2147

Re: Initial Comments

*In the Matter of Commission Consideration and Determination of Compliance with
Minnesota's Renewable Objectives for Year 2023*
Docket No: E999/PR-24-12

In the Matter of the Green Pricing and Verification Filing Process
Docket No: E999/PR-02-1240

Dear Mr. Seuffert:

Central Municipal Power Agency/Services (CMPAS) submits these enclosed Initial Comments responding to the Public Utilities Commissions Notice of Comment issued on January 23, 2025, regarding clarifications for compliance reporting and verification under Minn. Stat. § 216B.1691. We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list. Please contact me at (763) 710-3932 or jaya@CMPAS.org with any questions.

Sincerely,

Jay Anderson

Jay Anderson
Chief Executive Officer
Central Minnesota Municipal Power Agency/Services

Enc. Initial Comments of CMPAS
cc: Service List

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

Katie J. Sieben
Joseph K. Sullivan
Hwikwon Ham
John A. Tuma
[Vacant]

Chair
Vice Chair
Commissioner
Commissioner
Commissioner

IN THE MATTERS OF :

COMMISSION CONSIDERATION AND
DETERMINATION OF COMPLIANCE
WITH MINNESOTA’S RENEWABLE
ENERGY OBJECTIVES FOR YEAR 2023
Docket No. E-999/PR-24-12

Initial Comments of Central
Municipal Power Agency/Services

and

THE GREEN PRICING AND VERIFICATION
PROCESS
Docket No. E-999/PR-02-1240

Introduction

Central Municipal Power Agency/Services (CMPAS) submits these enclosed Initial Comments responding to the Public Utilities Commissions Notice of Comment issued on January 23, 2025, regarding clarifications for compliance reporting under Minn. Stat. § 216B.1691. CMPAS appreciates the chance to submit these comments and looks forward to future opportunities for input.

Additionally, CMPAS notes that its members include the City of Blue Earth, City of Fairfax, City of Glencoe, City of Granite Falls, City of Janesville, City of Kasson, City of Kenyon, City of Mountain Lake, City of Sleepy Eye, City of Springfield, City of Windom and/or their affiliated utilities¹.

Topics Open for Comment:

- 1. Response to the Department of Commerce’s Report to the Legislature, filed on January 21, 2025, in the current docket, including its recommendations to:**

¹ The City of Delano has terminated its membership with CMPAS and is no longer a member as of May 9, 2024.

- a. **Require each electric utility to notify the Department whether they will file on their own behalf the following year or if their power supplier will do on their behalf.**
- b. **Require each entity expected to report on an electric utility's behalf to file a letter in Docket No. E-999/CI-23-151 within 30 days of the Commission's Order, either affirming their responsibility to report on the Utility's behalf or stating they are not responsible for reporting on the Utility's behalf. Should the entity state that it is not responsible for reporting on behalf of an electric utility, it should provide the name of the entity that is responsible for reporting.**

CMPAS supports both recommendations in this topic. Over time various utilities can change power suppliers from what is listed on Commission Orders. For example, the Order in Docket No. E-999/CI-23-151 issued on April 12, 2024 does not reflect a change in CMPAS membership that took effect in May 2024, as noted in the footnote on page 1 of these comments. The recommendations in this topic can help ensure a common understanding of actions on compliance reporting under Minn. Stat. § 216B.1691 for all parties involved.

2. Are there other issues or concerns related to this matter?

CMPAS has no other issues or concerns related to this matter.