

**State of Minnesota
Before the Public Utilities Commission**

Katie Sieben	Chair
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
Joseph Sullivan	Commissioner
John Tuma	Commissioner

In the Matter of Xcel Energy's 2020-2034
Integrated Resource Plan

Docket No. E,002/RP-19-368

In the Matter of Minnesota Power's 2021-2035
Integrated Resource Plan

Docket No. E,015/RP-21-33

In the Matter of Otter Tail Power Company's
2022-2036 Integrated Resource Plan

Docket No. E,017/RP-21-339

Comments of the Citizens Utility Board of Minnesota

On November 2, 2021, the Institute for Local Self-Reliance and Vote Solar (collectively, "ILSR/VS") submitted a petition in the above-referenced dockets requesting the Commission's consideration of intervenor modeling costs in utility resource plan dockets (the "Petition"). Specifically, ILSR/VS requested "that the Commission order public utilities subject to the Commission's resource planning requirements to acquire EnCompass modeling licenses for intervening organizations in resource plan dockets."¹ ILSR/VS further requested that the Commission consider requiring utilities to provide certain information without a data request, including modeling inputs and settings, outputs, assumptions, post-processing spreadsheets, and model manuals.² The Citizens Utility Board of Minnesota ("CUB") supports this Petition.

Like ILSR/VS, we believe robust modeling from intervening parties is crucial for the Commission to have complete records upon which to evaluate utilities' integrated resource plans ("IRPs"). Intervenor involvement can help prevent utilities from unreasonably prioritizing shareholders' interests over those of ratepayers, evaluate opportunities to maximize ratepayer benefits, help ensure utilities remain committed to meeting carbon-reduction goals, and simply check utilities' modeling methodologies and results.

However, intervening in resource planning processes is a resource-intensive, costly undertaking. Though utilities can recover from ratepayers costs they incur through resource planning processes, intervenors—many of whom are nonprofit organizations—cannot.³ If the Commission requires utilities to provide modeling licenses to parties granted intervenor status, intervenors could more effectively participate in the planning process by saving costs associated with acquiring their own

¹ The Institute for Local Self-Reliance and Vote Solar (collectively, "ILSR/VS"), Petition Re: Modeling Software Costs and Utility Integrated Resource Plans, Dockets E-002/RP-19-368, E-015/RP-21-33, E-017/RP-21-339) (Nov. 2, 2021) ("ILSR/VS Petition").

² Id.

³ Though Minn. Stat. 216B.16 Subd. 10 authorizes the Commission to order utilities to compensate qualifying intervenors up to \$50,000 to cover costs of intervention, that authority is currently limited to general rate cases.

licenses. This is particularly important now, as CUB and other nonprofit advocates weigh whether we are able to participate in numerous, increasingly complex, and highly important dockets underway before the Commission. Similarly, if the Commission requires utilities to proactively provide intervenors modeling inputs and settings, outputs, assumptions, post-processing spreadsheets, and model manuals, then intervenors and utilities could avoid the unnecessary friction, costs, and delays associated with requesting and providing that information through a resource-intensive discovery process. We recognize that simply providing modeling licenses and associated data and manuals does not eliminate the costs associated with modeling; an intervenor still requires an expert to run the model and interpret the results. However, as ILSR/VS state, these are a “key ingredient” and will support robust interventions for a complete record.⁴

1. Commission Process for Evaluating the Petition.

In its Notice for Comment, the Commission requests comments on the process it should use to consider the petition. CUB is supportive of the Commission considering the Petition in a separate docket prior to the date that the next public utility IRP is filed, or of the Commission considering the petition in the currently open IRPs.

We recommend that the Commission’s order in this matter apply consistently to all public utilities. Considering the petition in a separate docket would allow for the Commission to take such action in a single order. Alternatively, the Commission could take up the Petition in each of the above-referenced dockets (Xcel’s, Minnesota Power’s, and Otter Tail Power’s open IRPs).

We share ILSR/VS’s interest in having the Petition approved as quickly as possible. For the Commission to take up this Petition in the course of its consideration of the open IRPs would ensure the Petition receives a timely hearing. Alternatively, if the Petition will be considered in a separate docket, we recommend that the Commission order be issued prior to January 1, 2023.

2. Other Issues Relevant to the Petition.

We believe it would be appropriate for the Commission to only require utilities to provide the requested license and modeling data to parties that have been granted intervention in the applicable resource planning docket. We would also like to note that the Petition does not ask—nor would its approval require—the Commission to amend the intervention requirements set forth in Minnesota Rule 7829.0800. The Commission continues to have authority to deny intervention petitions (and utilities to object to intervention petitions) when a petitioner—regardless of its ability to receive a modeling license and modeling data—does not meet the grounds for intervention set forth in Minnesota Rule 7829.0800 Subp. 2 or Subp. 3.

Finally, there is precedent for state utility regulators adopting the approach recommended in the Petition. ILSR/VS cite examples from Michigan and South Carolina.⁵ The New Mexico Public Regulation Commission (“New Mexico PRC”) took a similar approach when addressing a Public Service Co. of New Mexico (“PNM”) petition to retire two generators at a San Juan Generating Station (“SGJS”). Namely, the New Mexico PRC required PNM “at its cost, [to] afford all parties access by means of a proprietary

⁴ ILSR/VS Petition, p. 3

⁵ Id., pp. 2-3

license to all computer models used by PNM in support of its filing, including, but not limited to, its decisions to abandon its interest in SJGS to sever New Mexico ratepayers and its selection of proposed replacement resources.”⁶

In conclusion, we believe approval of the Petition will reduce friction and costs associated with utilities’ resource planning processes and make it easier for the Commission to evaluate and compare alternate resource plans built from a common platform. As a result, the Commission will be better informed when approving, rejecting, or modifying a utility’s resource plan consistent with the public interest.⁷ For these reasons, we strongly support the Petition.

CUB recommends that the Commission consider the petition either in a separate docket prior to January 1, 2023 or in the course of its consideration of each of the above-referenced IRPs.

Thank you for your attention to our comments in this matter.

Respectfully submitted,

December 28, 2021

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⁶ New Mexico Public Regulation Commission, Order Initiating Proceeding on PNM’s December 31, 2018 Verified Compliance Filing Concerning Continued Use of and Abandonment of San Juan Generating Station, Case No. 19-00018-UT (Jan. 30, 2019), p. 15, available at <https://edocket.nmprc.state.nm.us>.

⁷ See Minn. Stat. 216B.2422 Subd. 2.

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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Patrick	Zomer	Pat.Zomer@lawmoss.com	Moss & Barnett a Professional Association	150 S. 5th Street, #1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-368_19- 368_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jessica L	Bayles	Jessica.Bayles@stoel.com	Stoel Rives LLP	1150 18th St NW Ste 325 Washington, DC 20036	Electronic Service	No	OFF_SL_21-33_Official CC Service List
Laura	Bishop	Laura.Bishop@state.mn.us	MN Pollution Control Agency	520 Lafayette Rd Saint Paul, MN 55155	Electronic Service	No	OFF_SL_21-33_Official CC Service List
Jon	Brekke	jbrekke@grenergy.com	Great River Energy	12300 Elm Creek Boulevard Maple Grove, MN 553694718	Electronic Service	No	OFF_SL_21-33_Official CC Service List
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	200 S 6th St Ste 4000 Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_21-33_Official CC Service List
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-33_Official CC Service List
Riley	Conlin	riley.conlin@stoel.com	Stoel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-33_Official CC Service List
Hillary	Creurer	hcreurer@allate.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_21-33_Official CC Service List
Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota St Ste W1360 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_21-33_Official CC Service List
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_21-33_Official CC Service List
Stephanie L	Fitzgerald	sfitzgerald@mncenter.org	Minnesota Center for Environmental Advocacy	1919 University Ave W Ste 515 Saint Paul, MN 55104-3435	Electronic Service	No	OFF_SL_21-33_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_21-33_Official CC Service List
Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_21-33_Official CC Service List
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William D	Kenworthy	will@votesolar.org	Vote Solar	332 S Michigan Ave FL 9 Chicago, IL 60604	Electronic Service	No	OFF_SL_21-33_Official CC Service List
Becky	Lammi	cityclerk@ci.aurora.mn.us	City of Aurora	16 W 2nd Ave N PO Box 160 Aurora, MN 55705	Electronic Service	No	OFF_SL_21-33_Official CC Service List
James D.	Larson	james.larson@avantenergy.com	Avant Energy Services	220 S 6th St Ste 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-33_Official CC Service List
Emily	Larson	eLarson@duluthmn.gov	City of Duluth	411 W 1st St Rm 403 Duluth, MN 55802	Electronic Service	No	OFF_SL_21-33_Official CC Service List
Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota Street, Suite W1360 St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-33_Official CC Service List
Eric	Lipman	eric.lipman@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 551640620	Electronic Service	Yes	OFF_SL_21-33_Official CC Service List
Susan	Ludwig	sludwig@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_21-33_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_21-33_Official CC Service List
Daryl	Maxwell	dmaxwell@hydro.mb.ca	Manitoba Hydro	360 Portage Ave FL 16 PO Box 815, Station Main Winnipeg, Manitoba R3C 2P4 Canada	Electronic Service	No	OFF_SL_21-33_Official CC Service List
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	Yes	OFF_SL_21-33_Official CC Service List
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-33_Official CC Service List
Evan	Mulholland	emulholland@mncenter.org	Minnesota Center for Environmental Advocacy	1919 University Ave W Ste 515 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_21-33_Official CC Service List
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_21-33_Official CC Service List
Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_21-33_Official CC Service List
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-33_Official CC Service List
Susan	Romans	sromans@allete.com	Minnesota Power	30 West Superior Street Legal Dept Duluth, MN 55802	Electronic Service	No	OFF_SL_21-33_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-33_Official CC Service List
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	Yes	OFF_SL_21-33_Official CC Service List
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_21-33_Official CC Service List
Analeisha	Vang	avang@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	Yes	OFF_SL_21-33_Official CC Service List
Greg	Wannier	greg.wannier@sierraclub.org	Sierra Club	2101 Webster St Ste 1300 Oakland, CA 94612	Electronic Service	No	OFF_SL_21-33_Official CC Service List
Laurie	Williams	laurie.williams@sierraclub.org	Sierra Club	Environmental Law Program 1536 Wynkoop St Ste 200 Denver, CO 80202	Electronic Service	No	OFF_SL_21-33_Official CC Service List

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Laura	Bishop	Laura.Bishop@state.mn.us	MN Pollution Control Agency	520 Lafayette Rd Saint Paul, MN 55155	Electronic Service	No	OFF_SL_21-339_RP-21-339
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	OFF_SL_21-339_RP-21-339
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-339_RP-21-339
Brooke	Cooper	bcooper@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_21-339_RP-21-339
Aaron	Decker	adecker@mncenter.org	Minnesota Center for Environmental Advocacy	1919 University Ave W Ste 515 Saint Paul, MN 55104	Electronic Service	No	OFF_SL_21-339_RP-21-339
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John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance	2720 E. 22nd St Institute for Local Self-Reliance Minneapolis, MN 55406	Electronic Service	No	OFF_SL_21-339_RP-21-339
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_21-339_RP-21-339
Stephanie L	Fitzgerald	sfitzgerald@mncenter.org	Minnesota Center for Environmental Advocacy	1919 University Ave W Ste 515 Saint Paul, MN 55104-3435	Electronic Service	No	OFF_SL_21-339_RP-21-339

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Barb	Freese	bfreese@mncenter.org	Minnesota Center for Environmental Advocacy	1919 University Ave W Ste 515 Saint Paul, MN 55104-3435	Electronic Service	No	OFF_SL_21-339_RP-21-339
Jessica	Fyhrie	jfyhrie@otpc.com	Otter Tail Power Company	PO Box 496 Fergus Falls, MN 56538-0496	Electronic Service	Yes	OFF_SL_21-339_RP-21-339
Bruce	Gerhardson	bgerhardson@otpc.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_21-339_RP-21-339
Julie	Goehring	julie@redriverbasincommis sion.org		708 70 Ave NW Moorhead, MN 56560	Electronic Service	No	OFF_SL_21-339_RP-21-339
Adam	Heinen	aheinen@dakotaelectric.co m	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_21-339_RP-21-339
Shane	Henriksen	shane.henriksen@enbridge .com	Enbridge Energy Company, Inc.	1409 Hammond Ave FL 2 Superior, WI 54880	Electronic Service	No	OFF_SL_21-339_RP-21-339
Kristin	Henry	kristin.henry@sierraclub.or g	Sierra Club	2101 Webster St Ste 1300 Oakland, CA 94612	Electronic Service	No	OFF_SL_21-339_RP-21-339
Nathan	Jensen	njensen@otpc.com	Otter Tail Power Company	215 S. Cascade St. Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_21-339_RP-21-339
Richard	Johnson	Rick.Johnson@lawmoss.co m	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-339_RP-21-339
William D	Kenworthy	will@votesolar.org	Vote Solar	332 S Michigan Ave FL 9 Chicago, IL 60604	Electronic Service	No	OFF_SL_21-339_RP-21-339

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kate	Knuth	kate.knuth@gmail.com		2347 14th Terrace NW New Brighton, MN 55112	Electronic Service	No	OFF_SL_21-339_RP-21-339
Randy	Kramer	rlkramer89@gmail.com	Water and Soil Resources Board	42808 Co. Rd. 11 Bird Island, MN 55310	Electronic Service	No	OFF_SL_21-339_RP-21-339
James D.	Larson	james.larson@avantenergy.com	Avant Energy Services	220 S 6th St Ste 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-339_RP-21-339
Eric	Lindberg	elindberg@mncenter.org	Minnesota Center for Environmental Advocacy	1919 University Avenue West Suite 515 Saint Paul, MN 55104-3435	Electronic Service	No	OFF_SL_21-339_RP-21-339
Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_21-339_RP-21-339
Jan	Malcolm	Health.Review@state.mn.us	Minnesota Department of Health	PO Box 64975 St. Paul, MN 55164-0975	Electronic Service	No	OFF_SL_21-339_RP-21-339
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-339_RP-21-339
Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_21-339_RP-21-339
Debra	Opatz	dopatz@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_21-339_RP-21-339
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-339_RP-21-339

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-339_RP-21-339
Cary	Stephenson	cStephenson@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	Yes	OFF_SL_21-339_RP-21-339
Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 56537	Electronic Service	Yes	OFF_SL_21-339_RP-21-339
Amelia	Vohs	avohs@mncenter.org	Minnesota Center for Environmental Advocacy	1919 University Avenue West Suite 515 St. Paul, Minnesota 55104	Electronic Service	Yes	OFF_SL_21-339_RP-21-339
Laurie	Williams	laurie.williams@sierraclub.org	Sierra Club	Environmental Law Program 1536 Wynkoop St Ste 200 Denver, CO 80202	Electronic Service	No	OFF_SL_21-339_RP-21-339
Cameron	Winton	winton.cam@dorsey.com	Dorsey & Whitney LLP	50 S 6TH ST STE 1500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-339_RP-21-339
Patrick	Zomer	Pat.Zomer@lawmoss.com	Moss & Barnett a Professional Association	150 S. 5th Street, #1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-339_RP-21-339