



December 28, 2021

VIA E-FILING

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

Re: Institute for Local Self-Reliance and Vote Solar Request for Commission
Consideration of Intervenor Modeling Costs in Utility Resource Plan Dockets
Docket Nos. E015/RP-21-33, E002/RP-19-368, E017/RP-21-339

Dear Mr. Seuffert:

Minnesota Power (or, the “Company”) hereby submits its Comments in response to the Minnesota Public Utilities Commission’s (“Commission”) November 30, 2021 Notice in the above-referenced Dockets. The topics open for comment are:

1. What process should the Commission use to consider the Institute for Local Self-Reliance and Vote Solar (ILSR/VS) request, given multiple ongoing IRPs? For example, should the request be moved to a separate docket, or discussed in individual resource plan dockets?
2. Are there other issues or concerns related to this matter?

Below are the Company’s comments regarding ILSR/VS’s request in Minnesota Power’s most recent Integrated Resource Plan docket (“2021 IRP”).¹

Comments

1. What process should the Commission use to consider the Institute for Local Self-Reliance and Vote Solar (ILSR/VS) request, given multiple ongoing IRPs? For example, should the request be moved to a separate docket, or discussed in individual resource plan dockets?

¹ Docket No. E015/RP-21-33.

The Company does not strongly support one procedural method over another (i.e. moving to a separate docket vs being discussed in individual resource plan dockets). As initial comments in the Company's 2021 IRP are due March 30, 2022, time should be a major consideration as ISLR/VS's request asked that potential intervenor compensation first be applied to the Company's 2021 IRP. The Commission has already approved six extensions of the comment period since the February 1, 2021 initial submittal and Minnesota Power strongly opposes further delay to the current IRP proceeding.

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

A. Stakeholder engagement and public participation leading into the 2021 IRP filing was incredibly robust, including input on EnCompass modeling assumptions and inputs.

Minnesota Power initiated a first-of-its-kind stakeholder process 18 months prior to filing the 2021 IRP that brought diverse groups together to share insights and engaged host community members not normally represented at the Commission. In addition, it convened a subgroup of interested stakeholders ("Modeling Subcommittee") to work with Minnesota Power staff on developing modeling assumptions. The Center for Energy and the Environment, the Great Plains Institute, and Lasky Consulting ("Facilitators") were engaged as independent facilitators of the stakeholder process.

The 18-month long process brought together a diverse group that included over 70 diverse stakeholders representing various customer groups, environmental organizations, economic development entities, local government, industry, the host community, and others. The stakeholder group met to discuss Minnesota Power's system, regional energy needs, and customer expectations. The stakeholder meetings allowed participants the opportunity to provide their perspective regarding Minnesota Power's future energy mix and the impacts of transitioning the current power system.

As part of the formal stakeholder engagement process, the Facilitators convened the Modeling Subcommittee – of which Vote Solar was a participant – to work with Minnesota Power staff on developing modeling assumptions. The input and feedback received helped shape some of the key modeling inputs Minnesota Power used in the EnCompass analysis. For example, the technology curve that project declining costs for batteries, solar, and wind, were discussed and vetted with stakeholders at the Modeling Subcommittee meetings. The Company appreciates the feedback received and enjoyed the conversations with stakeholders. The assumptions resulting from working with

internal subject matter experts and stakeholders were provided in Appendix J of the Company's 2021 IRP Filing.

Finally, in addition to the formal facilitated stakeholder process, Minnesota Power recognized that, particularly during a global pandemic, not all customers are able to participate in a formal stakeholder process to share their insight with the Company. Therefore, the Company engaged all customers directly through a survey to better understand opinions and preferences related to their future energy supply. The survey included questions regarding system reliability, affordability, carbon-free energy renewable goals, and local economic impacts.

The comprehensiveness of this first-of-its-kind stakeholder process completed prior to filing Minnesota Power's 2021 IRP should be a consideration in any decision with the potential to delay the pending IRP process further.

B. There is an existing process for intervenor compensation.

The Minnesota State Legislature has authorized in Minn. Stat. §216B.16, subd. 10 that the Commission may require utilities to support intervenors in general rate cases and lays out specific criteria which a non-profit or individual must meet in order to qualify for compensation. Intervenor compensation within statute is limited only to general rate case proceedings and not integrated resource plan proceedings under Minn. Stat. § 216B.2422.

In recent years, the issue of intervenor compensation for Commission dockets outside of general rate cases has been introduced in bills at the legislature.²

Given the current lack of authority in statute to authorize intervenor compensation outside of general rate cases, the Company believes this issue is best resolved through a legislative solution. This would ensure an intervenor compensation process that is transparent and consistent, with clear criteria for compensation.

C. Many intervenors are already utilizing EnCompass.

Several intervenors in Minnesota Power's 2021 IRP are already utilizing EnCompass, including the Department of Commerce ("Department"), Large Power Intervenors, and Clean Energy Organizations (Fresh Energy, Clean Grid Alliance, Sierra Club, and Minnesota Center for Environmental Advocacy).

²https://www.revisor.mn.gov/bills/text.php?number=HF1289&version=latest&session=92&session_number=0&session_year=2021

While the acquisition of the EnCompass model may be cost prohibitive for some organizations, it is important to note that successfully utilizing a model is dependent on more than simply acquiring software. Expenses associated with modeling may include hiring staff or consultants to effectively use the model. As evidenced by the Clean Energy Organizations, non-profit organizations with similar interests often join together to reduce the cost of modeling for a single organization.

Additionally, it is the role of the Department to provide objective analysis and technical assistance to the Commission, and advocate for the public interest in resource plan proceedings before the Commission. It is unlikely that ISLR/VS would model significantly different inputs and assumptions than the Clean Energy Organizations and the Department.

Given the robust existing participation – both leading up to Minnesota Power's 2021 IRP and in intervenor's independent modeling and evaluation of the plan – there would be diminishing returns on ratepayer dollars if utilities were forced to acquire modeling licenses for every intervenor.

Finally, if Minnesota utilities were to pay for the cost of an EnCompass software license for intervenors like ISLR/VS, that license could then be used in regulatory proceedings outside of Minnesota while Minnesota ratepayers would bear all of the costs acquiring a license.

The Company believes ISLR/VS's request should not be approved for the reasons detailed above, and in particular should not be approved for Minnesota Power's 2021 IRP given the robust stakeholder process completed prior to filing the 2021 IRP in February 2021 and the upcoming comment deadline after multiple extensions. Minnesota Power is appreciative for the opportunity to provide Comments in these Dockets, and looks forward to future engagement on this topic.

Respectfully,

A handwritten signature in black ink, appearing to read 'Ana Vang', with a stylized, flowing script.

Ana Vang
Public Policy Advisor

AV:sr
cc: Official Service Lists

STATE OF MINNESOTA)
) ss
COUNTY OF ST. LOUIS)

AFFIDAVIT OF SERVICE VIA
ELECTRONIC FILING

Susan Romans of the City of Duluth, County of St. Louis, State of Minnesota, says that on the **28th** day of **December, 2021**, she served Minnesota Power's Compliance Filing in **Docket Nos. E002/RP-19-368, E017/RP-21-339 and E015/RP-21-33** on the Minnesota Public Utilities Commission and the Energy Resources Division of the Minnesota Department of Commerce via electronic filing. The persons on E-Docket's Official Service Lists for these Dockets were served as requested.



Susan Romans

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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
Kristin W	Duncanson	kristin@duncansongrowers.com		57746 Highway 30 Mapleton, MN 56065	Electronic Service	No	OFF_SL_21-339_RP-21-339
James C.	Erickson	jericksonkbc@gmail.com	Kelly Bay Consulting	17 Quechee St Superior, WI 54880-4421	Electronic Service	No	OFF_SL_21-339_RP-21-339
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

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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

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Stephan	Roos	stephan.roos@state.mn.us	MN Department of Agriculture	625 Robert St N Saint Paul, MN 55155-2538	Electronic Service	No	OFF_SL_21-339_RP-21-339
John	Saxhaug	john_saxhaug@yahoo.com		3940 Harriet Ave Minneapolis, MN 55409	Electronic Service	No	OFF_SL_21-339_RP-21-339
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