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December 30, 2021

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

**Re: *In the Matter of Minnesota Power's 2021-2035 Integrated Resource Plan et al.*
MPUC Docket Nos. E-015/RP-21-33, E-002/RP-19-368, and E-017/RP-21-339**

Dear Mr. Seuffert:

The Minnesota Office of the Attorney General—Residential Utilities Division (“OAG”) respectfully files this letter in response to the request for consideration of intervenor modeling costs filed by the Institute for Local Self-Reliance (“ISLR”) and Vote Solar (“VS”). The request raises complex procedural and administrative questions that deserve thoughtful consideration by the Minnesota Public Utilities Commission (“Commission”) and interested parties. Accordingly, the Commission should move the request to its own docket and notice another round of initial and reply comments to allow parties to properly analyze the request and its potential ratepayer impacts.

Background

On November 2, 2021, ISLR and VS filed a request seeking compensation for intervenor modeling costs in integrated resource plan (“IRP”) proceedings (the “Request”).¹ The Request asks the Commission to require public utilities subject to the Commission’s IRP dockets to provide intervenors with EnCompass modeling licenses in IRP dockets, starting with Minnesota Power’s pending IRP.² The Request also asks the Commission to require utilities to provide IRP modeling inputs, including settings, and outputs, assumptions, any post-processing spreadsheets, and the model manual without intervenor submission of a data request.³ ISLR and VS filed the Request in the pending Minnesota Power (Docket No. 21-33), Xcel Energy (Docket No. 19-368), and Otter Tail Power Company (Docket No. 21-339) IRP dockets.

On November 30, 2021, the Commission issued a Notice of Procedural Comment Period (“Notice”) in response to the Request.⁴ The Notice asks what process should be used to consider

¹ See generally *In the Matter of Minnesota Power's 2021-2035 Integrated Resource Plan et al.*, Docket Nos. E-015/RP-21-33, E-002/RP-19-368, and E-017/RP-21-339, Request for Intervenor Modeling Costs in Utility Resource Plan Dockets (Nov. 2, 2021).

² *Id.* at 3.

³ *Id.*

⁴ See Docket Nos. E-015/RP-21-33, E-002/RP-19-368, and E-017/RP-21-339, Notice of Procedural Comment Period (Nov. 30, 2021).

the Request and whether there are other issues or concerns in this matter.⁵ The OAG files this letter in response to the Notice.

The Request Raises Complex Questions that Should be Considered in their Own Docket

The Request raises complex procedural and administrative questions that should be considered in their own docket. For illustrative purposes, a non-exhaustive list of those questions is provided immediately below.

- The Minnesota Statutes provide for the award of intervenor compensation in the context of a general rate case proceeding, articulate the required findings needed to award intervenor compensation, and outline the required contents of a request for intervenor compensation.⁶ The Commission should consider whether the Request meets the statutory requirements and, if not, under what authority it is considering the Request as well as what standards it will use to evaluate the Request.
- Although intervenor participation IRPs may benefit ratepayers, the benefits of intervention must be carefully weighed against its costs to ensure that intervention does not improperly burden ratepayers. The Commission should solicit comments regarding which intervenors should be allowed receive compensation and under what criteria.
- The Request does not appear to limit the scope or breadth of intervenor compensation in IRPs. The Commission should solicit comments on caps or guardrails that could be applied to intervenor compensation requests to ensure that the cost of compensation does not outweigh its benefits for ratepayers. The Commission should also solicit comments on potential group licensing and/or cost-sharing options that could reduce the ratepayer impacts of intervenor compensation in IRPs.
- Ratepayers already pay millions of dollars in general rate case costs each year. The Commission should consider whether utilities should be required to pay some or all of the IRP intervenor compensation, instead of passing that cost on to ratepayers; particularly since ratepayers may be asked to foot the bill for future intervenors in other cases that might actively advocate against their interests.

Conclusion

As demonstrated by the non-exhaustive list of topics identified by the OAG, the Request raises important procedural and administrative questions that require additional examination by the Commission. The Commission should move the request to its own docket and notice another

⁵ *Id.*

⁶ See Minn. Stat. § 216B.16, subd. 10 (discussing the criteria for intervenor compensation and the applicable compensation amount in general rate case proceedings).

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round of initial and reply comments to provide interested parties with an opportunity to respond to the Request and ensure adequate record development on ratepayer issues.

Sincerely,

/s/ **Kristin Berkland**

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CERTIFICATE OF SERVICE

**Re: *In the Matter of Minnesota Power's 2021-2035 Integrated Resource Plan et al.*
MPUC Docket Nos. E-015/RP-21-33, E-002/RP-19-368, and E-017/RP-21-339**

I, JUDY SIGAL, hereby certify that on the 30th day of December, 2021, I e-filed with eDockets *a Letter of the Office of the Attorney General—Residential Utilities Division* and served a true and correct copy of the same upon all parties listed on the attached service list by e-mail, electronic submission, and/or United States Mail with postage prepaid, and deposited the same in a U.S. Post Office mail receptacle in the City of St. Paul, Minnesota.

/s/ Judy Sigal

JUDY SIGAL

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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_19-368_19-368_Official
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206 St. Paul, MN 551011667	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
Nathaniel	Runke	nrunkel@local49.org		1765 County Hwy 16 Rochester, MN 55902	Electronic Service	No	OFF_SL_19-368_19- 368_Official
Joseph L	Sathe	jsathe@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-368_19- 368_Official
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-368_19- 368_Official
Jeff	Schneider	jeff.schneider@ci.red-wing.mn.us	City of Red Wing	315 West 4th Street Red Wing, MN 55066	Electronic Service	No	OFF_SL_19-368_19- 368_Official
Mark	Schoennauer	markwsch@hotmail.com		607 19th St NW Apt 17 Rochester, MN 55901	Electronic Service	No	OFF_SL_19-368_19- 368_Official
Douglas	Seaton	doug.seaton@umwlc.org	Upper Midwest Law Center	8421 Wayzata Blvd Ste 300 Golden Valley, MN 55426	Electronic Service	No	OFF_SL_19-368_19- 368_Official
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7 h E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-368_19- 368_Official
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	Yes	OFF_SL_19-368_19- 368_Official
Andrew R.	Shedlock	Andrew.Shedlock@KutakRock.com	Kutak Rock LLP	60 South Sixth St Ste 3400 Minneapolis, MN 55402-4018	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
Joshua	Smith	joshua.smith@sierraclub.org		85 Second St FL 2 San Francisco, California 94105	Electronic Service	No	OFF_SL_19-368_19-368_Official
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	OFF_SL_19-368_19-368_Official
Beth H.	Soholt	bsoholt@windonthewires.org	Wind on the Wires	570 Asbury Street Suite 201 St. Paul, MN 55104	Electronic Service	No	OFF_SL_19-368_19-368_Official
Anna	Sommer	ASommer@energyfuturesgroup.com	Energy Futures Group	PO Box 692 Canton, NY 13617	Electronic Service	No	OFF_SL_19-368_19-368_Official
Mark	Spurr	mospurr@fcbenergy.com	International District Energy Association	222 South Ninth St., Suite 825 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_19-368_19-368_Official
Byron E.	Starns	byron.starns@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-368_19-368_Official
Scott	Strand	SStrand@elpc.org	Environmental Law & Policy Center	60 S 6th Street Suite 2800 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-368_19-368_Official
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-368_19-368_Official
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	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
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_19-368_19-368_Official
Thomas	Tynes	jjazynka@energyfreedomcoalition.com	Energy Freedom Coalition of America	101 Constitution Ave NW Ste 525 East Washington, DC 20001	Electronic Service	No	OFF_SL_19-368_19-368_Official
Lisa	Veith	lisa.veith@ci.stpaul.mn.us	City of St. Paul	400 City Hall and Courthouse 15 West Kellogg Blvd. St. Paul, MN 55102	Electronic Service	No	OFF_SL_19-368_19-368_Official
Julie	Voeck	julie.voeck@nee.com	NextEra Energy Resources, LLC	700 Universe Blvd Juno Beach, FL 33408	Electronic Service	No	OFF_SL_19-368_19-368_Official
Laurie	Williams	laurie.williams@sierraclub.org	Sierra Club	Environmental Law Program 1536 Wynkoop St Ste 200 Denver, CO 80202	Electronic Service	No	OFF_SL_19-368_19-368_Official
Samantha	Williams	swilliams@nrdc.org	Natural Resources Defense Council	20 N. Wacker Drive Ste 1600 Chicago, IL 60606	Electronic Service	No	OFF_SL_19-368_19-368_Official
Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine	225 South Sixth Street, Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-368_19-368_Official
Tim	Wulling	t.wulling@earthlink.net		1495 Raymond Ave. Saint Paul, MN 55108	Electronic Service	No	OFF_SL_19-368_19-368_Official
Emily	Ziring	eziring@stlouispark.org	City of St. Louis Park	5005 Minnetonka Blvd St. Louis Park, MN 55416	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
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

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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	rhoquette@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
	Cooper	bcooper@allte.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	jerricksonkbc@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 56538-0496	Electronic Service	No	OFF_SL_21-339_RP-21-339
Julie	Goehring	julie@redriverbasincommission.org		708 70 Ave NW Moorhead, MN 56560	Electronic Service	No	OFF_SL_21-339_RP-21-339
Adam	Heinen	aheinen@dakotaelectric.com	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.org	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.com	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

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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 7 h 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