January 10, 2022

Via Electronic Filing

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place E., 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 Institute for Local Self-Reliance (ILSR) and Vote Solar sincerely appreciate the robust response to the joint petition regarding modeling software costs, and particularly the significant interest in the issues of substance raised by the Department of Commerce, Xcel Energy, and other commenters.

We support the proposed approach of the Citizens Utility Board, to consider this petition in its own docket with the aim of a final order prior to January 1, 2023, and believe that proposal would provide the right approach to record development and sufficient time to address the questions raised by commenters. We are confident that most of the the concerns and issues raised by commenters can be resolved through further clarification or compromise while still achieving the goal of expanding the scope and quality of stakeholder participation in resource planning.

Thank you for your consideration, and we look forward to working with the Commission, the utilities and other stakeholders.

Sincerely, /s/ John Farrell, Institute for Local Self-Reliance 2720 E. 22nd St. Minneapolis, MN 55406 jfarrell@ilsr.org | 612-808-0888

Sincerely, /s/ Will Kenworthy, Vote Solar 332 S. Michigan Avenue, 9th Floor Chicago, IL 60604