



January 10, 2022

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 Reply Comments in response to the Minnesota Public Utilities Commission’s (“Commission”) November 30, 2021 Notice in the above-referenced Dockets and subsequent Comments filed by Parties. The topics open for comment were:

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?

The following Parties filed Comments: Community Power, Minnesota Department of Commerce Division of Energy Resources (“Department”), Minnesota Large Industrial Group (“MNLIG”), Minnesota Office of the Attorney General—Residential Utilities Division (“OAG”), Citizens Utility Board of Minnesota (“CUB”), Xcel Energy, and Otter Tail Power.

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

¹ Docket No. E015/RP-21-33.

Reply Comments

Other intervenors in this docket, including the Department and OAG, raised important questions about the ISLR/VS request. Those questions included clarifications of the exact nature of the request, whether the Commission has statutory authority to act on this matter, the cost/benefit to customers of intervenor compensation, intervenor compensation criteria, and questions around jurisdictional cost sharing. The Company believes these questions, as well as others posed in initial comments, should be answered prior to the Commission considering whether intervenor compensation in the form of EnCompass modeling access should be granted.

Minnesota Power's 2021 IRP comment period has already been extended six times since the February 1, 2021 initial submittal and Minnesota Power strongly opposes further delay to its current IRP proceeding. Initial comments are now due March 30, 2022 – more than a year after the 2021 IRP was filed. As stated in the Department's Comments, "[O]nce a party obtains a license and modeler, it may take 6 months to one year for the modeler to learn EnCompass, become familiar with each utility's modeling processes, conduct new modeling runs, and file comments." Given the six extensions that have already been approved in Minnesota Power's 2021 IRP docket, and the likely 6 month to one year additional delay that would be needed for ISLR/VS to conduct new modeling runs and submit comments, Minnesota Power believes ISLR/VS's request should not be granted for its 2021 IRP.

ISLR/VS's request should not be approved, and in particular should not be approved for Minnesota Power's 2021 IRP. The Company appreciates all parties' time and engagement on this topic, and looks forward to further conversation.

Respectfully,

A handwritten signature in black ink, appearing to read 'Ana Vang', with a stylized, sweeping flourish at the end.

Ana Vang
Senior Public Policy Advisor

AMV:th
cc: Service List

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

AFFIDAVIT OF SERVICE VIA
ELECTRONIC FILING

Tiana Heger of the City of Duluth, County of St. Louis, State of Minnesota, says that on the 10th day of January, 2022, she served Minnesota Power's Reply Comments in **Docket Nos. E015/RP-21-33, E002/RP-19-368, E017/RP-21-339** 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 List for this Docket were served as requested.



Tiana Heger