

In the Matter of the Southern Minnesota Municipal Power Agency Integrated Resource Plan

PUC Docket Number: ET9/RP-21-782

LIUNA Minnesota & North Dakota appreciates the opportunity to offer comments on the Integrated Resource Plan (“IRP”) filed by the Southern Minnesota Municipal Power Agency (“SMPMA”). While we generally believe that the approach taken in the IRP is reasonable, we believe that further information is needed on what efforts, if any, SMPMA plans to make to mitigate negative socioeconomic impacts associated with the early retirement of Sherco Unit 3, and how the loss of associated jobs and business opportunities to Minnesota might be offset by efforts to maximize the local economic benefit of planned investment in solar and wind energy.

SMPMA has indicated that an additional 225 MW of new solar generation and 50 MW of new wind generation will be needed to meet expected demand in light of the retirement of Sherco Unit 3. The construction jobs, lease payments and local tax revenues associated with solar and wind may not fully replace the benefits of 360 MW of coal generation. But these benefits can mitigate the worst impacts of a coal-plant retirement and provide new career opportunities for the next generation of energy workforce, provided that SMPMA is committed to maximizing benefits to local workers and communities.

In our review of SMPMA’s IRP, we were unable to find any discussion of the organization’s plans for procurement of 225 MW of solar and 50 MW of wind generation. We would suggest that SMPMA consider providing information similar to that provided by Xcel Energy in the company’s IRP, which also addressed retirement of Sherco 3 and plans to mitigate job and economic losses through investment in construction of renewable energy and transmission with a priority for local workers and creation of union apprenticeship opportunities. We ask that SMPMA consider similar planning efforts and commitments as part of the current IRP.

Dated: June 1, 2022

Respectfully Submitted,
LIUNA Minnesota & North Dakota

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