

August 12, 2022

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

Re: **IN THE MATTER OF SOUTHERN MINNESOTA MUNICIPAL POWER AGENCY'S
2022-2036 INTEGRATED RESOURCE PLAN: DOCKET NO. ET9/RP-21-782**

Dear Mr. Seuffert:

The enclosed document contains Southern Minnesota Municipal Power Agency's reply to the comments submitted by LIUNA Minnesota & North Dakota on June 1, 2022 relating to the above referenced docket.

This document has been filed by e-filing with Minnesota Public Utilities Commission on August 12, 2022, as shown in the attached Certificate of Service.

If you have any questions, please contact me at (507) 292-6460.

Sincerely,



Mark S. Mitchell
Director of Operations and COO

Attachments
cc: Dave Geschwind

MSM:jh

**STATE OF MINNESOTA
BEFORE THE PUBLIC UTILITIES COMMISSION**

Katie Sieben	Chair
Joseph Sullivan	Vice-chair
Valerie Means	Commissioner
Matt Schuerger	Commissioner
John Tuma	Commissioner

In the Matter of Southern Minnesota Municipal Power Agency's 2022-2036 Resource Plan
Docket No. ET9/RP-21-782

**Southern Minnesota Municipal Power Agency's reply to the comments submitted by LIUNA
Minnesota & North Dakota on June 1, 2022**

CERTIFICATE OF SERVICE

I, Joseph A. Hoffman, hereby certify that I have this day served a copy of the following, or a summary thereof, on Will Seuffert and Sharon Ferguson by e-filing and First Class mail, and to all other persons on the attached service list by electronic service or by First Class mail.

Dated this **12th** day of **August, 2022**

/s/ Joseph A. Hoffman

Joseph A. Hoffman

Director – Agency and Government Relations
Southern Minnesota Municipal Power Agency
507-292-6427

Official Service List
Southern Minnesota Municipal Power Agency
2022-2036 Integrated Resource Plan
Docket No. ET9/RP-21-782

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michael	Ahern	ahern.michael@dorsey.com	Dorsey & Whitney, LLP	50 S 6th St Ste 1500 Minneapolis, MN 554021498	Electronic Service	No	OFF_SL_21-782_RP-21-782
Douglas M.	Carnival	dmc@mcgrannshea.com	McGrann Shea Carnival Straughn & Lamb	N/A	Electronic Service	No	OFF_SL_21-782_RP-21-782
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_21-782_RP-21-782
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174 Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_21-782_RP-21-782
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_21-782_RP-21-782
David P.	Geschwind	dp.geschwind@smmpa.org	Southern Minnesota Municipal Power Agency	500 First Avenue SW Rochester, MN 55902	Electronic Service	No	OFF_SL_21-782_RP-21-782
James	Hartson			59931 300th Street Waltham, MN 55982	Paper Service	No	OFF_SL_21-782_RP-21-782
Joe	Hoffman	ja.hoffman@smmpa.org	SMMPA	500 First Ave SW Rochester, MN 55902-3303	Electronic Service	No	OFF_SL_21-782_RP-21-782
Mike	Jones	mikejones@lignite.com	Lignite Research Council	1016 E Owens Ave Ste 200 PO Box 2277 Bismarck, ND 58502	Electronic Service	No	OFF_SL_21-782_RP-21-782
Nate	Jones	njones@hcpd.com	Heartland Consumers Power	PO Box 248 Madison, SD 57042	Electronic Service	No	OFF_SL_21-782_RP-21-782
Ronald J.	Klinefelter	Klinefelter@wapa.gov	Western Area Power Administration	Office Of General Counsel 12155 West Alameda Parkway Lakewood, CO 802282802	Electronic Service	No	OFF_SL_21-782_RP-21-782
Robert	Lunder	Robert.Lunder@mdu.com	Montana-Dakota Utilities (ET)	400 N 4th St Bismark, ND 58501	Electronic Service	No	OFF_SL_21-782_RP-21-782
Jan	Malcolm	Health.Review@state.mn.us	Minnesota Department of Health	PO Box 64975 St. Paul, MN 55164-0975	Electronic Service	No	OFF_SL_21-782_RP-21-782
Mark S	Mitchell	ms.mitchell@smmpa.org	SMMPA	500 2st Ave SW Rochester, MN 55902-3303	Electronic Service	No	OFF_SL_21-782_RP-21-782
Christina	Pierson	christinap@cmpasgroup.org	Central Minnesota Municipal Power Agency	459 S Grove St Blue Earth, MN 56013	Electronic Service	No	OFF_SL_21-782_RP-21-782
Chrisitna	Pierson	christinap@cmpas.org	Central Municipal Power Agency/Services	459 S Grove Street Blue Earth, MN 56013	Electronic Service	No	OFF_SL_21-782_RP-21-782
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_21-782_RP-21-782
Robert H.	Schulte	rhs@schulteassociates.com	Schulte Associates LLC	1742 Patriot Rd Northfield, MN 55057	Electronic Service	No	OFF_SL_21-782_RP-21-782
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_21-782_RP-21-782
Beth H.	Soholt	bsoholt@windonthewires.org	Wind on the Wires	570 Asbury Street Suite 201 St. Paul, MN 55104	Electronic Service	No	OFF_SL_21-782_RP-21-782
Jeremy	Sutton	Jsutton@rpu.org	Rochester Public Utilities	4000 E River Rd Rochester, Minnesota 55906	Electronic Service	No	OFF_SL_21-782_RP-21-782
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_21-782_RP-21-782
Toni	Volkmeier	toni.volkmeier@state.mn.us	MPCA	520 Lafayette Rd. N. St. Paul, MN 55155	Electronic Service	No	OFF_SL_21-782_RP-21-782

Reply Comments of Southern Minnesota Municipal Power Agency

Docket Number: ET9/RP-21-782
Reply Relating To: LIUNA Minnesota & North Dakota Comments dated June 1, 2022
Reply Date: August 12, 2022
Reply By: Mark S. Mitchell, Director of Operations & COO
Email Address: ms.mitchell@smmpa.org
Phone Number: 507-292-6460

SMMPA's Reply Comments: SMMPA appreciates the comments offered by LIUNA Minnesota & North Dakota as they relate to the Agency's Integrated Resource Plan.

In LIUNA's comments, Mr. Pranis suggests that SMMPA include in its IRP information that addresses the retirement of Sherco 3 and plans to mitigate job and economic losses.

SMMPA shares Mr. Pranis' concerns about the impacts of the planned Sherco 3 closure on the local economy in Sherburne County. Over the last 35 years, the men and women at Sherco have played a key role in providing Minnesota a major source of safe, reliable and affordable electricity. SMMPA is a co-owner of Sherco 3, however all the Sherco staff are employees of Xcel Energy. For this reason, SMMPA must defer to Xcel Energy on any questions relating to employment matters at Sherco 3.

As outlined in the IRP, SMMPA intends to make notable investments in solar and wind generation over the next decade. SMMPA's membership is made up exclusively of 18 cities from across Minnesota. While SMMPA's primary focus is on our member communities, it is SMMPA's preference that whenever practical, local labor be utilized in the construction of generation projects.

SMMPA staff had the opportunity to hold a virtual meeting with Mr. Pranis on July 20, 2022 to discuss LIUNA's comments and concerns. I would describe that day's conversation as friendly and productive. Topics included the proposed retirement of Sherco 3, SMMPA's plans for significant wind and solar additions, progress that has been made by renewable developers in using local labor, and LIUNA's desire to continue to increase the use of local labor to construct renewable energy projects.

While we recognize and appreciate LIUNA's concerns, we don't believe any further additions or modifications to SMMPA's IRP are warranted.