

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

RE: In the Matter of Minnesota Power's 2021-35 Integrated Resource Plan, Docket No. E-015/RP-21-33

Mr. Seuffert:

These comments from the City of Cohasset are respectfully submitted in response to Minnesota Power's Integrated Resource Plan. Cohasset is the host city to the company's Clay Boswell coal plant. Cohasset is proud to host the Boswell plant, which has powered the region and our local economy for decades. The plant also supports hundreds of jobs that pay well above the median household income for our area.

The City is also a proud partner of Minnesota Power's on a number of fronts. We value our relationship with the utility and its employees. As we head toward this transition, the company has been an active partner in working to help diversify our local tax base and we are grateful for those efforts.

The City is also broadly supportive of Minnesota Power's goals to pursue ambitious carbon-free generation goals while continuing to serve our region with affordable, reliable energy. That said, as the Commission is aware, this transition will have deep and permanent impacts on our community. This resource plan proposes the full and final retirement of the two remaining coal-fired units at the Boswell plant, proposing to retire unit 3 by 2030 and ceasing coal operations at unit 4 by 2035.

Like many host communities, what happens to the plant looms as an existential question for us. We are a City of less than 3,000 people, and Cohasset has already experienced a small preview of the impacts of plant retirement with the retirement of Boswell units 1 and 2. Those retirements significantly reduced the city's total tax capacity, as well as the share of our tax base that is contributed by the utility. While our City council and staff are working tirelessly to mitigate these impacts through fiscal responsibility and by diversifying our tax base through development, the scale of these transitions resulting in an immediate shift of the local tax burden onto other residents and businesses in our city.

Both individually and as a member of the Coalition of Utility Cities, the City has actively pursued support from the legislature and will continue to be actively engaged in efforts to support our community and our peers in other host communities.

The City also collaborates actively with our colleagues in Xcel territory on the unique challenges and opportunities we confront as host communities. As such, we have had the opportunity to review the Commission's April 15th order in Xcel's IRP, Docket Number E-002/RP-19-368. The City is grateful to

the Commission for including significant provisions in that order to support communities and workers that will be impacted by plant retirement.

In the same spirit of the provisions in the Commission's order on Xcel's IRP, the City of Cohasset urges you to adopt the following, similar set of recommendations:

- 1) Authorize the Executive Secretary of the Commission to open a new docket on site development and remediation plans for the Boswell site.
- 2) Minnesota Power shall conduct stakeholder meetings regarding the site with interested parties including the City of Cohasset; adjacent cities and townships including the City of Grand Rapids, Itasca County; The Minnesota Department of Commerce, the Minnesota Department of Natural Resources, the Minnesota Pollution Control Agency, the Center for Energy and Environment, the Minnesota Energy Transition Office, and labor unions. By January 1, 2024 of the year following approval of this plan, Minnesota Power shall file in the new docket details describing updates on the site and the stakeholder outreach and meetings.
- 3) Following those stakeholder meetings, by December 31, 2024, or in its next resource plan if earlier—and annually thereafter—Minnesota Power shall submit to the Commission and to the City of Cohasset a detailed report describing the company's plans for disposition of the Boswell site, equipment, and buffer property. The report shall include at least the following items:
 - a. To the extent possible, a detailed description of the timeline, estimated costs, and steps necessary to remediate pollution at the Boswell site.
 - b. A section detailing how the company is working to ensure that plans for site remediation, economic development, or future development and maintenance of power generation, transmission, or distribution infrastructure are consistent with the community's long-range planning and vision.
 - c. A description of any ongoing efforts by the company to evaluate future uses for the plant site, any buffer property owned by the company, or any adjacent property, including a description of how the company is involving interested stakeholders in those efforts.
 - d. An update to the Commission on the status of efforts to support the city's and region's economic development efforts, including—to the extent possible—specific projects and investments the company is assisting the City and region in attracting.
 - e. A description of the company's efforts to work with local governments and
 - f. Any other items the Commission or the company see fit to include

The City further encourages the Commission to adopt any decision options designed to support workers who are employed at the plant, support the plant, or whose jobs will be in any way impacted by plant retirement.

Thank you for your consideration,

By:

Mayor Greg Hagy