

In the Matter of Great River Energy's 2023-2037 Integrated Resource Plan

Comments of LIUNA Minnesota and North Dakota

PUC Docket Number: ET-2/RP-22-75

LIUNA Minnesota & North Dakota appreciates the opportunity to offer comments on the proposed Integrated Resource Plan filed by Great River Energy ("GRE").

First, we want to recognize and thank GRE for the efforts the utility has made to engage a broad range of stakeholders, including organized labor, in the development of the proposed Integrated Resource Plan. While the organization's first obligation is to member distribution co-ops and their member customers, GRE has long demonstrated a commitment to working in partnership with host communities and other stakeholders. During the preparation of the IRP, GRE organized listening sessions with community, environmental, and labor organizations to understand our priorities. GRE also provided an opportunity for stakeholder representatives to get a first-hand look at the operation of Cambridge Station.

Second, we believe that GRE's plan is well-designed to meet members' energy needs over the next 15 years is well-designed to meet the utility's obligations under Minnesota's new carbon-free standard while maintaining affordable and reliable electric service. Over the period of the IRP, GRE will phase in significant new renewable generation while phasing out most coal-fired generation and relying on infrequently-used but critically-important gas peaking plants to meet capacity and reliability needs.

Following the sale of Coal Creek, GRE has just one significant coal-fired generation asset in Spiritwood Station. We believe that studying the potential for carbon capture the feasibility is the appropriate next step to reduce GRE's greenhouse gas footprint without losing the value of GRE's investment in the plant and the substantial co-benefits it provides to local businesses and to the workers and local communities that rely on paychecks and other economic activity tied to Spiritwood.

As the IRP filing notes, Spiritwood supports more than 100 family-supporting jobs and provides process steam to industrial customers. If the results of the study are favorable, use of carbon capture technology would also help GRE to maximize the benefits of the Inflation Reduction Act, which the Public Utility Commission has identified as a priority for all utilities.

Third, we appreciate GRE's commitment to carefully considering and maximizing the local socioeconomic benefits of the utility's operations and planned investments, but would appreciate the inclusion of additional information in the IRP. Under provisions of the newly-enacted 100% clean energy law, utilities are required to consider local job impacts, with a particular focus on construction jobs, as part of resource planning and acquisition.

“Subd. 4a. Preference for local job creation. As part of a resource plan filing, a utility must report on associated local job impacts and the steps the utility and the utility's energy suppliers and contractors are taking to maximize the availability of construction employment opportunities for local workers. The commission must consider local job impacts and give preference to proposals that maximize the creation of construction employment opportunities for local workers, consistent with the public interest, when evaluating any utility proposal that involves the selection or construction of facilities used to generate or deliver energy to serve the utility's customers, including but not limited to an integrated resource plan, a certificate of need, a power purchase agreement, or commission approval of a new or refurbished electric generation facility. The commission must, to the maximum extent possible, prioritize the hiring of workers from communities hosting retiring electric generation facilities, including workers previously employed at the retiring facilities.” 216B.2242.

Even before being required to do so, however, GRE has made proactive efforts to consider local job impacts and maximize benefits to local workers and communities across the utility's generation portfolio. GRE has worked with developer NextEra Energy Resources to ensure that investments in wind energy are creating high-quality union jobs for Minnesota workers on projects like Buffalo Ridge and Dodge Wind among others.

GRE also prioritized local job impacts in the handoff of Coal Creek Station, which remains a critically-important source of local jobs and economic activity in central North Dakota, including for dozens of LIUNA members who help to maintain the facility. While the decision was not universally popular, GRE managed to divest its largest remaining coal plant while providing the smoothest possible transition for the men and women who have kept it running. While the future of the plant is uncertain, enhanced IRA support for carbon capture provides a potential path for delivering low-carbon energy without a devastating shutdown. Further, GRE has leveraged the utility's arrangement with Rainbow to support beneficial wind energy development that will bring jobs and income that is not entirely reliant on coal to an area where they are badly needed.

The IRP indicates that GRE intends to make similar efforts going forward, for example through the use of local union labor to install a new and innovative Form Energy iron-air battery. We believe it would be helpful, however, for GRE to provide initial estimates of potential job impacts and plans for other elements of the proposed portfolio, including the continuation of the Coal Creek PPA, acquisition of wind PPAs, etc.

We thank the Commission for its consideration and look forward to reviewing comments submitted by other parties.

Dated: August 8, 2023

Respectfully Submitted,
LIUNA Minnesota & North Dakota

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