

Re: PUC docket number 22-75

Dear PUC members,

I write as a member-owner of the Cooperative Light and Power Association of Lake County, itself a member-owner of the Great River Energy cooperative.

I would like to echo CURE's reply comments highlighting that GRE's request for its next IRP filing date is out of line with both Minnesota Rules and that the outcome of GRE's New ERA funding application would have significant short-term implications.

I would like to add that since this current IRP is based in large part upon projections from the pre-IRA 2021 EIA AEO it is badly out of date now, let alone by the time 2027 arrives.

Additionally, GRE addresses CURE's point regarding the long-term trend of renewable costs by drawing attention to the last 2 years of wind and solar PPA prices, underlining that this period has bucked longer-term trends, attributing this to "a significant increase in demand, commodity costs, material costs, has experienced difficulties with supply chains, and increases to the cost of money".

Obviously a lot of that has been due to the economic fallout from the pandemic coupled with demand spikes partially induced by the subsidies contained in last year's Inflation Reduction Act that affected industries have not yet completely adjusted to. It is unsupported to imply that these short-term trends will continue for as long as the next four years, especially given that [US manufacturing producer prices have already stabilized](#). Clearly the NREL also does not agree given its projections that the long-term trends of [wind](#) and [solar](#) costs will resume sooner rather than later.

Yours sincerely,

Geoffrey P. Tolley  
Two Harbors, MN 55616