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October 17, 2023

Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 Seventh Place East, Suite 350  
St. Paul, MN 55101

Re: *In the Matter of the Great River Energy's 2023-2037 Integrated Resource Plan;*  
*Docket No. ET-2/RP-22-75*

Dear Mr. Seuffert,

CURE respectfully submits these comments in response to comments timely submitted in the above docket. We are encouraged by much of the information provided in Great River Energy's (GRE) comments and appreciate the cooperative's willingness to share more details about the New ERA application it submitted. Still, not all of CURE's concerns have been addressed.

### **Load Forecast Assumptions and Modeling Variables**

Figuring out how our electric utilities will support the widespread electrification of transportation is and will continue to be an essential part of resource planning moving forward. As such, GRE's decision to join the Electric Power Research Institute's EVs2Scale2030 program is promising. But participation in that group does not answer concerns CURE raised about the modeled load forecast assumptions in *this* Integrated Resource Plan (IRP) being based on outdated information about electric vehicle (EV) adoption. Again, CURE understands and agrees with GRE's assertion that accurate forecasting for EV adoption can be difficult to achieve. But the least GRE can and should do is reassess its load forecast using the Energy Information Administration's (EIA) 2023 Annual Energy Outlook.<sup>1</sup> Doing so will allow GRE and the Public Utilities Commission (Commission) to determine whether GRE's Preferred Plan will be able to meet the increased load—especially from nighttime EV charging—that is likely to occur with an increase in EV adoption.

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<sup>1</sup> U.S. Energy Information Administration, *Annual Energy Outlook 2023*, Table 38. *Light-Duty Vehicle Sales by Technology Type*. Data available at <https://www.eia.gov/outlooks/aeo/>.



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CURE is also appreciative of GRE’s explanation for its decision to leave self-build solar out of its modeling variables. But we disagree with the assertion that whether future solar resources will be self-builds or power purchase agreements (PPAs) is not “ripe” at this moment. As GRE knows, the costs for self-build solar and solar PPAs are distinct. Without providing a self-build option for the model, that option can never be chosen. This in turn restricts the model’s ability to choose the best timing for *all* solar resource options, including self-builds, going forward. Providing a self-build solar option might cause the model to choose a different set of resources across a different timeframe. This is why CURE believes it is important to include a self-build solar option in the model at this time. Of course, situations may change by the time GRE’s projected 2031 capacity shortfall might occur. But as CURE, GRE, and the Commission are all aware, building and connecting these resources can often take several years. Being able to adequately prepare for this timeline now is essential for ensuring GRE can meet member-owner energy needs without incurring avoidable or unnecessary costs in the future.

Lastly, GRE’s insistence that self-build solar need not be included in this IRP is especially concerning because GRE has stated its preference for an April 2027 filing deadline for its next IRP. By that point, the potential 2031 capacity deficit will be even closer. As such, CURE reiterates our request that the Commission direct GRE to re-run its model with at least three self-build solar options—fixed-tilt, single-axis tracking, and solar-plus-storage.

### **Issues the Commission Should Consider for GRE’s Next IRP**

CURE also reiterates our request for the Commission to consider the anticipated impact of federal funding obtained by GRE, if any, and to require GRE to model the retirement of Spiritwood Station by 2040. As we stated previously, although a retirement of Spiritwood may not actually occur in 2040, it makes sense for GRE and the Commission to begin considering what impacts an eventual retirement would have on GRE’s overall energy mix, and costs to member-owners.

### **GRE Should File its Next IRP on April 1, 2025**

Pursuant to Minnesota Rule 7843.0300, subpart 2, GRE should file its next IRP on April 1, 2025.<sup>2</sup> Beyond this regulatory requirement, it is of paramount importance that GRE file its next IRP within the next two years. GRE is the largest generation and transmission cooperative in the state and serves nearly 700,000 member-owners, about 1.7 million

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<sup>2</sup> “Beginning July 1, 1991, and July 1, 1992, *and every two years afterward*, an electric utility *shall* submit a proposed resource plan covering the forecast period.” Minn. R. 7843.0300 (emphasis added).

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people, or almost 30% of the state's population. Consistent, up-to-date energy planning information is essential to the wellbeing of these member-owners.

In explaining why a 2027 deadline for the next IRP is appropriate, GRE states that “the Preferred Plan does not add new resources until the early 2030s.” But earlier in its reply comment, GRE also notes that it is proposing 1,264 MW of utility-scale wind projects, which New ERA funding “will be able to accelerate and secure these pre-construction project to *being operation in 2026.*” (emphasis added). GRE’s member distribution cooperatives are also scoping “129 MW of distributed solar energy, 11.5 MW of wind and solar-wind-storage hybrid projects, and 115 MW of member-directed, transmission-connected renewable energy.” To comply with New ERA funding requirements, all projects must be completed and verified by September 30, 2031.

Given these variables, it is illogical to allow GRE to delay four years to submit its next IRP. New ERA funding, if obtained, will significantly change the outlook of GRE’s Preferred Plan, especially in terms of timing. If GRE does not secure federal funding through New ERA or other programming, it may make sense to wait until April 2027 to file a new IRP. In that case, GRE would be able to request an extension of this deadline from the Commission; a process with which GRE is familiar. But until then, it is reasonable and follows the Commission’s own regulations to require GRE to file its next IRP by April 1, 2025.

CURE thanks the Commission for the opportunity to submit these reply comments and for its careful consideration of these issues.

Sincerely,

/s/Sarah Mooradian

Government Relations and Policy Director

CURE

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