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COMPASS TO MUNICIPAL POWER  
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January 19, 2024

**Via Electronic Filing**

Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
Saint Paul, MN 55101-2147

Re: Initial Comments

In the Matter of an Investigation into Implementing Changes to the Renewable Energy Standard and the  
Newly Created Carbon Free Standard under Minn. Stat. §216B.1691  
Docket Number: E-999/CI-23-151

Dear Mr. Seuffert:

Attached are the Initial Comments of the Central Minnesota Municipal Power Agency, doing business as Central Minnesota Municipal Power Agency/Services, in response to the Commission's December 20, 2023, Notice of Comment Period in the above-referenced docket.

Please contact me at (763) 710-3932 or [jaya@CMPAS.org](mailto:jaya@CMPAS.org) if you have any questions.

Sincerely,

Jay Anderson, CEO  
Central Minnesota Municipal Power Agency/Services

Enc. Initial Comments of CMPAS  
CC: Service List

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

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Joseph K. Sullivan  
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Commissioner  
Commissioner  
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In the Matter of an Investigation into  
Implementing Changes to the Renewable  
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Docket Number: E-999/CI-23-151

Initial Comments of  
Central Minnesota Power Agency/Services

**INTRODUCTION**

Central Minnesota Municipal Power Agency, doing business as Central Municipal Power Agency/Services (CMPAS – pronounced “compass”), is a municipal power agency organized under §§ 453.51 through 453.62 of the Minnesota Statutes. CMPAS provides a wide-range of power management and utility services to its municipal electric utility members and affiliates, including strategic management, long-term power supply planning and procurement, energy market scheduling services, transmission ownership, project development and administration, utility accounting and finance support, and system mapping and modeling. CMPAS operates as a project-oriented agency, which allows our members to control individual electric utility asset portfolios.

**INITIAL COMMENTS**

1. Whether and how municipal power agencies are subject to reporting under Section 216B.1691 as an “Electric Utility.”

Under section §216B.1691 Subd.1(d), the definition of “Electric Utility” includes municipal power agencies, such as CMPAS. Therefore, CMPAS is obligated under Subd. 3 to submit reports to the Commission demonstrating its efforts to comply with the carbon-free standards under subd. 2g. Because CMPAS is not required under current law to submit integrated resource planning reports under section 216B.2422, CMPAS will meet this obligation by filing a “separate report” that includes the components described in subd. 3(a)(1)-(9). This will therefore include the reporting of renewable energy credits utilized by CMPAS, on behalf of its members, to meet the standards in accordance with subd. 4.

- a. Should the Commission require each municipal power agency to identify which of its members’ electric sales are reported by another entity, which entity is reporting for each member, and the percentage of the member’s sales reported by that entity.

Although CMPAS is not a full requirements Agency, it does sell power to its members and does have information about the sources of power utilized by its members to serve their customers. CMPAS also handles the REC reporting of its members. It is important to note that CMPAS will have to utilize MISO generation data and/or make assumptions relating to the mix of renewables purchased from the MISO market which are not identified by source. Therefore, CMPAS will be able to report the retail sales of its members, as well as the generating resources, including renewable energy credits, utilized by its members to cover those sales. CMPAS's members include<sup>1</sup>:

City of Blue Earth  
City of Fairfax  
City of Glencoe  
City of Granite Falls  
City of Janesville  
City of Kasson  
City of Kenyon  
City of Mountain Lake  
City of Sleepy Eye  
City of Springfield  
City of Windom

- b. Should the Commission require each municipal power agency to identify any member's retail power sales that are not reported for purposes of Minn. Stat. § 216B.1691?

See response to Question 1(A): CMPAS will identify the total sales and resources for each member.

- c. Should the Commission require each municipal power agency to make a compliance filing identifying a point of contact (name, address, contact information) for purposes of enforcing compliance with Minn. Stat. § 216B.1691?

CMPAS believes it would be administratively efficient for there to be a single point of contact identified in the compliance filing. For CMPAS, the single point of contact will be the Chief Executive Officer.

- d. Are there other matters associated with municipal power agencies that should be reported to the Commission in connection with Minn. Stat. § 216B.1691?

No. CMPAS is comfortable with the reporting requirements under the legislation as currently promulgated. However, there must be an administratively efficient means of reporting market energy purchases procured by JAAs on behalf of their members as such purchases generally do not specify resource type. For example, the PUC could allow JAAs to assign a resource mix percentage for such purchases on an RTO/ load zone basis.

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<sup>1</sup> City of Delano has terminated its membership with CMPAS and will no longer be a member as of June 1, 2024.

2. Should the Commission require that any entity that intends to report on behalf of one or more electric utilities newly subject to Section 216B.1691, displayed in Table 1 below, identify:

- a. The electric utilities they intend to report on behalf of; and
- b. The portion of each electric utilities' total retail electric sales covered by the report?

(Ex. If a public utility supplies a distribution utility with 100% of the energy they consume in a year, the public utility would name the distribution utility they are reporting for, and state that 100% of the distribution utility's energy sales will be covered by its report.)

N/A (CMPAS does not intend to report on any of the electric utilities newly subject to Section 216B.1691, displayed in Table 1 of the Notice).

3. Please identify any distribution cooperatives that serve fewer than 50 Minnesota customers (such as those located near the state's border), that have not been included in the list of Electric Utilities displayed in Table 1 below who are included in the definition of "electric utility" in Section 216B.1691. Does the Commission have any authority to modify these utilities' obligation to comply with Section 216B.1691? If so, how should the obligations be modified?

N/A (CMPAS does not have any information pertaining to this question.)

4. Are there any other issues helpful to the Commission's implementation of Minn. Stat. § 216B.1691?

CMPAS urges the Commission to be mindful that the members of project agencies such as CMPAS are subject to local control through their governing bodies, meaning that resource decisions are made by and for the customers they serve.