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July 1, 2020

VIA E-FILING

Will Seuffert Executive Secretary Minnesota Public Utilities Commission 121 7th Place East, Suite 350 St. Paul, MN 55101-2147

Re: In the Matter of Minnesota Power's 2015 Integrated Resource Plan

Docket No. E015/RP-15-690

In the Matter of Minnesota Power's Petition for Approval of the Energy Forward

Resource Package

Docket No. E015/M-17-568

Minnesota Power's 2016 Rate Case

Docket No. E015/GR-16-664

Dear Mr. Seuffert;

Attached is a letter from Minnesota Power's third party facilitators providing an update on the stakeholder engagement process for the Integrated Resources Plan, Baseload Retirement Study and Securitization Plan.

If you have any questions regarding this filing, please contact me at ijpeterson@mnpower.com or 218.355.3202.

Sincerely,

Jennifer J. Peterson Manager – Regulatory Strategy and Policy 30 W. Superior Street Duluth, MN 55802

JJP:th Attach. To: Minnesota Public Utilities Commission

Fr: Trevor Drake, Randy Lasky, and Audrey Partridge

RE: Update on Stakeholder Engagement Process for Minnesota Power's Integrated

Resource Plan

Date: June 25, 2018

Dear Commissioners.

The Great Plains Institute (GPI), the Center for Energy and Environment (CEE), and Lasky Consulting, respectfully submit this letter to provide an update on the stakeholder engagement process for Minnesota Power's upcoming integrated resource plan. Together, our three organizations have been hired by Minnesota Power to design and execute the ongoing stakeholder engagement process. We are filing this letter to provide context on what the process will look like going forward in light of the COVID-19 pandemic and under either the existing or extended deadline.

As neutral facilitators, we are not parties to this docket and are not expressing an opinion on whether the deadline extension request should be approved.

Process Before the COVID-19 Pandemic

This stakeholder engagement process was designed to elicit participation from a broad range of individuals and entities and to explore a wide set of issues related to Minnesota Power's integrated resource plan, including impacts to:

- Minnesota Power's customers
- Northern Minnesota's communities and the regional economy
- The environment
- The electric grid

We initiated the process by holding meetings with several different stakeholder groups across Minnesota Power's service territory and in the Twin Cities. In total, we held eight of these meetings to provide information about integrated resource planning, the specific issues being considered in this plan, and most importantly, to ask stakeholders what their questions, concerns, and priorities were with regard to the plan.

During each of these meetings, we recorded stakeholder questions and comments and followed each meeting with a survey so that participants could indicate the specific issues that were most important to them. We then used the results of these surveys to inform the next phase of the process, in which we planned to hold three all-day meetings with a "joint" group of approximately 40 stakeholders representing key perspectives from various stakeholder groups across Minnesota Power's service territory and advocacy groups who typically engage in resource planning proceedings at the Minnesota Public Utilities Commission (Commission).

We held the first of these three meetings in Grand Rapids on March 9th, with a focus on identifying and defining the desired outcomes that stakeholders care about most. Throughout the day, participants had the opportunity to engage in multiple small group discussions focused on issues related to customers, communities, the environment, and the utility itself. For each of these four areas, a subgroup of participants worked together to define 3-4 key issues in each area and a 4-point rating scale for each issue, ranging from "worst possible" to "best possible" outcomes. These issues and rating scales were put into an "issue map" that could later be used as a tool to discuss impacts resulting from various resource planning scenarios.

While many participants have strong concerns related to this resource plan, and in particular considerations around the retirement of Boswell 3 and 4, the meeting on March 9th was respectful and productive. It surfaced several considerations in each of these four issue areas, and it provided an opportunity for dialogue amongst stakeholders with very different perspectives.

As described above, we had planned to convene the "joint" stakeholder group for three all-day meetings, but we put the process on hold in response to the COVID-19 pandemic, which began to impact Minnesota shortly after the March 9th meeting. The original plan for the second meeting was to discuss a series of future scenarios related to Minnesota Power's resource planning efforts, and to use the issue map created during the March 9th meeting as a tool for understanding and discussing the impacts that those scenarios might have on the issues stakeholders care about most. The original plan for the third meeting was to review initial modeling results from Minnesota Power, seeking to draw understanding and insights from the modeling and ultimately discuss insights, conclusions, and recommendations to inform the resource plan, drawing on the previous two discussions.

In addition to the broader stakeholder meetings described above, we also convened a smaller group of stakeholders and their modeling consultants to work with Minnesota Power staff on refining the assumptions that will be used for the company's EnCompass modeling. This group has met twice and is continuing to meet virtually.

Changes due to COVID-19 and Process Going Forward

In response to the COVID-19 pandemic, we felt it was best to wait to reconvene the stakeholder group, in particular because the group included representatives from local governments and companies that were either shifting priorities to address pandemic impacts or facing serious economic challenges.

At this point, we have spoken with most of the stakeholders and believe that we can run a productive process through virtual meetings, sticking with the general plan described above but modifying as needed to accommodate a virtual format. The process plan we designed going forward has three general steps that will take place across 5 half-day virtual meetings:

Phase 1 -- Revise issue map and rating scales: For this phase, we envision two half-day meetings focused on reviewing and revising the issue map and rating scales that were developed in the March 9th meeting. Since the map and scales are to be used both to document stakeholder interests and as a tool for discussion, we want to ensure they are as accurate and consensus-based as possible. The first of these meetings is scheduled for July 15th.

- Phase 2 -- Establish 2-4 future scenarios and discuss how each would impact the issue map: This phase is focused on developing a series of different future scenarios for Minnesota Power's service territory, including but not limited to resource planning considerations. These are intended to support a robust discussion and ultimately bring about better understanding amongst the many diverse perspectives around what decisions Minnesota Power might make with respect to its resource plan and the impact those decisions might have on the things stakeholders care about most. We envision this taking place over two half-day meetings.
- Phase 3 -- Identify conclusions and actions: This phase involves identifying
 collective insights, conclusions, and recommendations from the scenarios discussion to
 inform Minnesota Power's resource plan. We envision having this discussion during a
 single half-day meeting.

If the extension request is granted, we intend to convene these five half-day meetings on a monthly cadence starting in July and ending in November, with the possibility of convening an additional meeting if needed to ensure stakeholder input is adequately incorporated.

<u>If the extension request is not granted</u>, we will implement a streamlined version of these three steps, which would include fewer meetings, a more frequent cadence of meetings, or both.

While we defer to the commission and parties in assessing whether a deadline extension is in the public interest, as facilitators of this process we want to point out that one of the benefits of a stakeholder process like this is to incorporate voices that do not typically engage in Commission proceedings. Keeping the October 1st, 2020 deadline may limit our ability to meaningfully engage some stakeholders.

We want to thank the Commission for consideration of this letter, and the many stakeholders for their ongoing participation and thoughtful engagement in this process.

Respectfully,
/s/
Trevor Drake
Program Manager, Electricity
Great Plains Institute
/s/
Randy Lasky

/s/

Lasky Consulting

Audrey Partridge
Regulatory Policy Manager
Center for Energy and Environment

STATE OF MINNESOTA)) ss	AFFIDAVIT OF SERVICE VIA ELECTRONIC FILING
COUNTY OF ST. LOUIS)	

Tiana Heger of the City of Duluth, County of St. Louis, State of Minnesota, says that on the 1st day of July, 2020, she served Minnesota Power's Extension Request in **Docket No. E015/RP-15-690, E015/M-17-568** and **E015/GR-16-664** on the Minnesota Public Utilities Commission and the Energy Resources Division of the Minnesota Department of Commerce via electronic filing. The persons on E-Docket's Official Service List for this Docket were served as requested.

Tiana Heger