

**STATE OF MINNESOTA  
MINNESOTA PUBLIC UTILITIES COMMISSION**

Katie Sieben	Chair
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
Joseph Sullivan	Commissioner
John Tuma	Commissioner

In the Matter of Minnesota Power's 2021-  
2035 Integrated Resource Plan

Docket No. E015/RP-21-33

**Petition to Intervene By The Citizens Utility Board of Minnesota**

Pursuant to Minn. Rules 7843.0300, and 7829.0800, the Citizens Utility Board of Minnesota (CUB) hereby petitions to intervene in the above-referenced docket.

CUB is a nonprofit advocate for Minnesota's residential and small business utility consumers. CUB has two main roles. First, we serve as a resource for people around Minnesota to help them better understand how they use and pay for their energy; how they can reduce the costs or environmental impacts of their energy use, take advantage of assistance programs, and avoid disconnection; and the broader energy system and energy policy in Minnesota. Our second role is to be a voice for regular people in energy-related legislative and regulatory proceedings. Often, CUB is the sole consumer advocate participating in policy making processes, and we play an important role in helping the Commission balance ratepayers' interests with those of utilities and other advocates.

CUB is well positioned to present issues and develop facts that assist the Commission in fully considering Minnesota Power's Integrated Resource Plan. CUB's staff, as well as its outside consultants, have extensive experience and expertise in analyzing the economics and environmental impacts of utility resource planning decisions, various ownership structures, and the associated risks to Minnesota's citizens and Minnesota Power's customers.

CUB has intervened and/or participated in a variety of Commission proceedings involving resource planning and other related issues and regularly participates in dockets before the Minnesota Public Utilities Commission, including in the following recent dockets:

- E002/RP-19-368: In the Matter of Xcel Energy's 2020-2034 Upper Midwest Integrated Resource Plan;
- E002/CI-18-251: In the Matter of Distribution System Planning for Xcel Energy;
- E002/PA-18-702: In the Matter of Acquisition of the Mankato Energy Center (MEC);

- E015/M-20-850: In the Matter of the Petition for Approval of Changes to Minnesota Power's Residential Rate Design<sup>1</sup>;
- E,G-999/M-19-505: In the Matter of a Petition by Citizens Utility Board of Minnesota to Adopt Open Data Access Standards;
- G-008/M-21-48: In the Matter of an Inquiry into CenterPoint Energy's request for approval of its Advanced Metering Project.

In these dockets and others, CUB has developed an expertise on advanced utility system planning and, in particular, how utilities can deploy clean energy and advanced grid technologies to benefit consumers by improving efficiency, improving fairness within customer classes, reducing costs, and reducing emissions. In addition, we have provided information regarding energy options, policy topics, and active PUC Dockets — as well as personal energy consultations — to hundreds of consumers from northeast Minnesota in recent years.

CUB was also an active participant in the stakeholder sessions held in advance of Minnesota Power filing its 2021 Integrated Resource Plan that is the subject of this docket. As the primary (non-governmental) consumer advocate participating in this process, we helped initiate and inform discussions on such topics as defining residential affordability, securitization of stranded assets, and how a proper clean energy transition should benefit small consumers.

CUB will be supported in this docket by GridLab and Strategen Consulting. GridLab is a nonprofit whose mission is to provide technical grid expertise to enhance policy decision-making and to ensure a rapid transition to a reliable, cost effective, and low carbon future. Strategen provides technical and economic analysis, among other expertise, to government, industry, NGO, and utility clients to help them advance clean energy and fairness in utility cost allocation and program design.

In this docket, CUB plans to evaluate Minnesota Power's proposed Integrated Resource Plan with respect to the factors listed at Minn. R. 7843.0500, subp. 3, with particular focus on how the plan accounts and prepares for current and future risks to ratepayers as the utility system faces a potential substantial evolution, with the retirement of the Boswell Energy Center and increasing viability of advanced generation and grid technology. We anticipate that this will include evaluations of demand response options, the utility's load forecast options, electrification, and possibly other considerations. This list is preliminary. CUB may discover additional issues that we will wish to address through further examination and investigation, and therefore we reserve the right to raise additional issues through comments or other appropriate means.

CUB's interest in Minnesota Power's Integrated Resource Plan can only be adequately represented through its intervention in this docket. No other consumer advocate has petitioned for intervention in the docket, and no other intervening party brings the types of expertise described above.

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<sup>1</sup> In this docket, CUB conducted a study for Minnesota Power, "Customer Segmentation of Minnesota Power Residential Customers," which analyzed the effect of various advanced rate design options on Minnesota Power's residential customers using actual interval customer energy use data provided by the utility.

For these reasons, CUB respectfully requests that the Commission grant its petition to intervene in this proceeding in order to ensure that Minnesota Power's integrated resource plan is consistent with the interests of ratepayers.

Respectfully submitted,

June 23, 2021

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/s/ Annie Levenson-Falk

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