

## CITY OF DULUTH

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October 14, 2018

Minnesota Public Utilities Commission 121 7th Place East, Suite 350 Saint Paul, MN 55105

Dear Commissioners,

I am writing in support of Administrative Law Judge Jeanne Cochran's recommendation to deny Minnesota Power's petition to build and co-own the Nemadji Trail Energy Center in Superior, Wisconsin. As a Duluth city councilor, I am concerned about the project's potential impact on local ratepayers as well as its potential climate impact.

As documented in Judge Cochran's findings, the applicant has failed to demonstrate that the proposed plant is needed. Judge Cochran found that the applicant has failed "to analyze a sufficient range of alternatives to determine whether the NTEC resource is truly needed in 2025 or whether some other portfolio of resources would better meet the Company's resource needs in a cost-effective manner." The judge further found that wind, solar, storage, and energy efficiency may be able to offer cleaner energy at a more affordable price.

The \$350 million price tag for Minnesota Power's portion of the project will be passed along to ratepayers, both residential and commercial. As the elected representative of thousands of these ratepayers, I am concerned about the potential impact of this unnecessary project. Many of my constituents live on fixed and limited incomes. While rate increases are sometimes necessary and justified, the PUC most be vigilant in protecting the interests of ratepayers for whom any increase in costs is a hardship.

I am also concerned about the climate impact of the proposed facility. Research increasingly shows that natural gas is not a climate-friendly transitional fuel, particularly when one factors in the impact of methane that is leaked during the production process. The applicant, Minnesota Power, has not committed to reducing its reliance on coal should the NTEC be approved and has not sufficiently complied with the PUC's 2016 order to work on Demand Response Planning. Rather than building a new fossil fuel fired facility, Minnesota Power should follow the lead of other regional utilities and invest aggressively in solar, wind, and in energy efficiency.

As a regulated monopoly, private electrical utilities are obliged to operate in the public interest. We look to the PUC to ensure that they do so. In this case the applicant has failed to demonstrate the need for this project – a project that will have negative effects both on ratepayers and on the climate. I urge you to reject the petition.

Sincerely.

Joel Sipress

2<sup>nd</sup> District Duluth City Councilor