

March 29, 2023

RE: SF 2847, DE1 amendment

Senator Nick Frentz, Chair
Senate Energy, Utilities, Environment and Climate
St. Paul, MN

Dear Senator Frentz:

On behalf of Missouri River Energy Services (MRES) and our 25 municipal electric utility members in Minnesota, we offer the following comments on SF 2847, as amended with the DE1 amendment, dated March 27. While MRES and its members continue to work towards a greener portfolio, we do so with a watchful eye on resource adequacy, reliability, and affordability. It is with this in mind that MRES offers the following comments.

First, MRES and its members would like to thank Chair Frentz and members of the committee for their work this session leading up to SF 2847. We had a lot of meetings and discussions on a variety of the bills before the committee and appreciate the time and consideration given.

Grid Resiliency Grants, Article 4, Section 44

MRES and its members would like to thank Chair Frentz and the members of committee for including municipal electric utilities, as well as joint action agencies such as MRES, as eligible entities for the grid resiliency grants under this section of HF 2847. As electric generation becomes more diverse in type and in geographic location, grid resiliency is key. We also appreciate the language within that program allowing grants for the safety of personnel performing duties on the power system. MRES deploys lineworkers to our members for distribution maintenance; those lineworkers are employees of MRES and are “shared” among smaller municipal electrics. Their safety and safety training are paramount.

Climate Innovation Finance Authority (Green Bank): Article 4, Section 38.

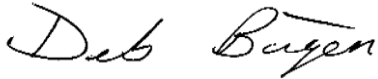
First, we note that the House version (HF 2754) contains language adding a representative of consumer-owned utilities to the Authority board. We urge that similar language be adopted into SF 2847. It is important that the Authority board have utility expertise to help the board understand the nuances and the day to day operations of utilities. It is particularly important to have consumer-owned utility representation. Not-for-profit utilities bring a unique perspective to these issues and how projects impact their rate-payer-owners. Second, we understand and recognize that the author’s intent of this language is to fill a space not already occupied by other entities, utilities, or agencies. MRES and its municipal utility members already have robust Conservation Improvement Programs (CIP), Electrification Conservation and Optimization (ECO) programs, and provide custom energy efficiency programs for commercial or industrial customers (key accounts programs). In order to assure that these utility programs are not duplicated or undercut, we urge language be added to require meaningful contact and consultation with the incumbent utility. This could be accomplished by adding language to require contact with the incumbent utility under Subdivision 5 (page 94.18--underserved market analysis). Language similar to that found on page 83.9 of this bill (solar on public buildings) would be amenable.

Community Solar Gardens: Article 4, Section 15

MRES suggests some clarification language in the Community Solar Gardens language. While it is clearly the intent of the language to apply only to public utilities (IOUs), the drafted language oscillates between “public utility” and “utility” (e.g. at lines 53.27, 53.31). We urge that the language be amended to consistently use “public utility” for greater clarity.

MRES would like to thank Chair Frenz for allowing us to comment on this important bill.

Sincerely,

A handwritten signature in cursive script that reads "Deb Birgen".

Deb Birgen
Vice-President, Government Relations