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April 8, 2025

Sen. Founq Hawj, Chair
Environment, Climate, and Legacy Committee
Minnesota Senate

Dear Chair Hawj and committee members:

MMUA is a voluntary membership association representing the interests of municipally owned electric, gas, and water utilities across the State. We respectfully submit this written testimony to flag serious objections our members have regarding article 7, section 3 of the committee's omnibus bill, SF 2077. While article 7 primarily deals with permitting efficiency efforts, section 3 grants the Minnesota Pollution Control Agency (MPCA) the authority to mandate the use of air dispersion modeling of air contaminants from a number of uses which would include electric generation operators. The use of such modeling has long been a contentious issue and has nothing to do with permit efficiency. In fact, mandating the use of such modeling may actually hamper efficiency efforts due to the lack of modeling techniques that would provide an accurate representation of the actual impact of discharge from small municipal operations.

MMUA is not opposed to reasonable environmental standards being imposed, nor do we deny a responsibility to reasonably demonstrate compliance, but authorizing MPCA to require modeling as provided in article 7, section 3 of SF 2077 will increase costs and permit processing time and impose an undue hardship on municipal utilities while generating distorted air quality readings. In fact, the EPA has acknowledged that it is not prudent to mandate such modeling on generators that operate for short durations on a sporadic bases, usually to ensure the reliability of the grid.

For these reasons, MMUA requests that section 3 of article 7 be deleted from SF 2077.

Respectfully submitted,

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