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April 30, 2025

Sen. FOUNG Hawj, Chairperson
Members of the Environment, Climate, and Legacy Committee

Re: SF 2781

MMUA respectfully submits this written testimony to reiterate objections our members have regarding Article 3, Section 3, page 59 lines 21-24 of SF 2781 as amended by the A1 amendment. This provision of the bill 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. Authorizing the MPCA to require modeling as provided in SF 2781 will increase costs 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 on a sporadic bases and for short durations, usually to ensure the reliability of the grid.

Please feel free to contact me if you have any questions.

Respectfully submitted,

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