
May 2025

**Senate Environment, Climate and Legacy
Senate File 2781**

Good morning, Chairman Hawj and members of the committee. My name is Deb Birgen, with Missouri River Energy Services (MRES), and I am submitting this written testimony in opposition to lines 59.21 to 59.24 of the A-1 amendment filed for the May 1 committee hearing on SF 2781.

The language at lines 59.21 to 59.24 states that the Minnesota Pollution Control Agency (MPCA) may require air emissions facilities to conduct air dispersion modeling is problematic to say the least. This language gives the MPCA carte blanche authority to add additional modeling requirements for municipal electric utilities. This would place undue burdens on these locally owned municipal utilities by requiring additional modeling and associated costs. In allowing the MPCA to require additional modeling, it would give the MPCA the authority to limit or eliminate municipal utilities' ability to rely upon critical backup/emergency diesel generators, which are essential for rural communities to provide power during grid failure, extreme weather, and other power related emergencies.

MPCA has sought in the past to require municipal utilities in Greater Minnesota to use modeling to determine whether such diesel generators—which are infrequently used—would cause violations of air standards. However, the model that MPCA has sought to have municipal electric utilities use, requires these utilities to inaccurately assume they are using the backup/emergency generators at full capacity, 365 days a year, in worst case scenarios, when in reality these generators normally run less than 20 hours during an entire year. This modeling makes it impossible for many small municipal utilities to demonstrate compliance, even when there is no realistic scenario that would lead them to violate air quality standards. This could force these municipal utilities to decommission these essential back-up generators and put the lives of Greater Minnesota residents at risk during emergency situations.

MRES will note how important these back up generators are. During the polar vortex of 2021, MRES members were called upon to run these backup generators. However, they were not running them for local city reliability but were running them for regional grid stability at the request of the Regional Transmission Organizations (RTOs) and federal balancing authorities. Municipal generation was contributing directly to keeping the bulk electric grid operational.

MRES has also seen this emergency backup generation in play in the aftermath of powerful storms and tornados. There have been occasions when our Minnesota members have been cut off from the RTOs and bulk electric grid due to a loss of power lines during a storm. They have been able to use this back up generation to power their communities—keeping essential medical equipment operational, keeping food and medical supplies refrigerated, and keeping the lights on—until the transmission lines were restored.

Therefore, MRES opposes lines 59.21 to 59.24 of the A-1 amendment for SF 2781 and asks for the language to be removed.