

Clean Power Plan Comment Development: Issues for Consideration

Items below reflect suggestions from Clean Power Plan Stakeholder Group members for potential areas of comment to EPA.

- Pathway/approach for state plans – has MPCA identified a preference?
 - MPCA hasn't identified a preferred approach yet, but applauds the flexibility of EPA offering multiple approaches
- Resource planning considerations – challenge of moving some energy planning/regulating authority via a state plan to agencies (MPCA) not traditionally involved in such activities
- Correcting numbers
 - Sherco
 - Renewable assumptions
 - Efficiency improvements – how might we capture Sherco 3's turbine upgrade; Boswell 3 and 4
 - § Sherco's improvement would likely factor into its base number; efficiency issues factor into goal setting, not compliance strategy
 - Equity concerns – not requiring rate payers to pay for extra efficiency requirements because early gains are not counted
 - Competitiveness – concerns over economic competitiveness as well as environmental improvement
- Analysis of legalities issued under this and impact on Minnesota State Laws
- Recognizing early action/incentivizing it – potentially seeking "tweaks" to building block calculation strategies to ensure the rule doesn't disincentivize early actions
 - Natural gas that follows wind (different capacity factor, perhaps?)
 - Replacement of coal with gas
 - § Outreach to neighboring states – those interested/willing
- How different types of coal retirements are accounted for in this rule (already occurred, imminent, vulnerable plants who may retire in future)
 - Already occurred does not count
 - Imminent and future will count
- Requiring states to use some form of modeling (IPM) to project out to 2030 in target setting; revisions of state plans (process?)
- Should the glide-path to 2030 (binding 2020-2029 targets) be required if states achieve final 2030 target?

Objectives for continued stakeholder process

Items below reflect suggestions from Clean Power Plan Stakeholder Group members on potential considerations and objectives for post-comment-development stakeholder processes.

- Web page with all documents, meeting notes
- Larger open stakeholder group and smaller tech groups, other focus groups
- Environmental justice forums – solicit broader input than ongoing stakeholder groups; not necessarily PCA's purview to talk about topics like worker transition, community impacts but they are important issues – perhaps partner with other agencies/groups to do that approach
- PUC/resource planning involvement – economic impacts, rates, timing with IRP processes