



July 1, 2022

Via e-filing

Consumer Affairs Office
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul MN 55101

Re: In the Matter of a Request for a Minor Alteration to Great River Energy's 170 MW, Natural Gas-Fired, Simple Cycle Combustion Turbine Generator at its Cambridge 2 Peaking Plant Site near Cambridge, Isanti County, Minnesota, PUC Docket No. 22-122

Dear Mr. Bruce,

Public Employees for Environmental Responsibility (PEER) respectfully submits these supplemental reply comments on the Minnesota Public Utilities Commission's (Commission) above-captioned comment period. Since the Commission has ordered the preparation of an Environmental Assessment Worksheet (EAW) at its June 23 meeting, we presume, and request, that additional comment periods be scheduled after that information is made available in an adequate final EAW. As a result of that anticipated additional commenting opportunity, PEER will only briefly address topics covered by the company in reply comments.

I. Response to GRE comments

PEER agrees with several positions GRE has presented in comments and come around to since it submitted reply comments. First, PEER agrees with GRE's position at the June 23 hearing on the petition for an EAW that the company does not dispute the need for an EAW for the proposed project. This concession is useful as it negates most of GRE's stated positions in its reply comment.¹

Second, PEER agrees with GRE's position that the Commission should consider expeditiously deciding on the need for an Environmental Impact Statement (EIS) for GRE's project.² It will save all parties' and agency resources to acknowledge that this project has the potential for

¹ Available at [20226-186515-01](#) [hereinafter "GRE Reply"]. See, e.g., *id.* at 1 ("GRE appreciates the opportunity to provide additional information showing that the addition of dual fuel capability will not result in significant changes in the human or environmental impact of Cambridge 2.")

² *Id.* at 9.

significant impacts to the environment necessitating full environmental review with an EIS. While in some cases an EAW serves a valuable scoping purpose for an EIS, in this case the Commission has enough familiarity with the topic area to order full review without passing through the intermediary step. As discussed in earlier PEER comments, applicable MEPA and Commission regulations require an EIS for this project under the full permitting process. When the EIS is ordered, alternatives considered should include various forms of energy storage, including proven technologies such as pumped hydro³ or other technologies⁴ that would address GRE's stated need⁵ of more storage capacity than may be available from batteries alone. The EIS should also address demand response and ratepayer home weatherization programs as a solution to GRE's professed need to shave peak demand. Including these alternatives will address GRE's concern that merely analyzing a second location for Cambridge 2 would be a meaningless exercise.

Third, PEER agrees with GRE that PEER's comments to this point have not explained in detail why this project also requires recertification with a new Certificate of Need.⁶ PEER has thus far limited its comments to the questions that the Commission raised and responses to points made by other commenters. However, it would be appropriate for the Commission to request additional comments on this topic in subsequent stages in this docket. Again, as with ordering an EIS, the sooner this matter is settled the more party resources can be conserved. When applying for a new Certificate of Need GRE will also finally be able to substantiate its statements that this project is needed to assure reliability – an oft-repeated but never proven issue in this docket.

Fourth, PEER agrees with GRE that climate change is a clear and present danger to its business model,⁷ and that adaptation is now necessary to deal with increased business risk. The best way to mitigate risk is to stop the harm from worsening at the same time as GRE adapts, and therefore investing in energy generation that does not rely on burning fuels will protect both GRE and Minnesotans in the long term. It is a false solution to adapt to climate change by burning additional dirty fuels.

While we are pleased that GRE had provided some additional context on discrepancies in its reporting to EPA as revealed in ECHO data,⁸ GRE's comment still does not address or rebut the

³ While GRE's needs would be far smaller than these projects, it is important to acknowledge that this is a proven technology with a long track record. *See, e.g.*, Federal Infrastructure Projects Permitting Dashboard Gordon Butte Pumped Storage, Sept. 22, 2016, <https://www.permits.performance.gov/projects/gordon-butte-pumped-storage-n> ; Federal Infrastructure Projects Permitting Dashboard, Swan Lake North Pumped Storage, Sept. 22, 2016, <https://www.permits.performance.gov/permitting-projects/swan-lake-north-pumped-storage>.

⁴ Matt Reynolds, *Gravity Could Solve Clean Energy's One Major Drawback*, WIRED, Jan. 4, 2022, <https://www.wired.com/story/energy-vault-gravity-storage/>.

⁵ This was stated by GRE's representative on June 23 when he explained that batteries could supply 4 hours of peaking energy but the company sought 24 or more hours of peaking energy.

⁶ GRE Reply, *supra* note 1, at 8 n.9.

⁷ *Id.* at 7.

⁸ *Id.* at 6.

issues of increased potential to emit raised in CURE's initial comments.⁹ As a result, the company has continued to fail to provide sufficient information for the Commission to be able to grant the minor alteration application. The fact that the Commission has determined that an EAW is required in response to a citizen petition is, as GRE conceded in an earlier comment, sufficient proof to determine that the minor alteration cannot be granted.¹⁰ While the company has not provided sufficient information to approve, the record already demonstrates that the Commission ultimately will have to deny GRE's request. The sooner this decision is made the better, considering the construction timeline that GRE has only started to sketch out in its reply comment.

II. Conclusion

For the foregoing reasons, PEER requests that the Commission schedule additional commenting rounds, after the EAW for this project is concluded. Additionally, if the Commission would like to conserve agency and party resources, it could consider denying the minor alteration application on the record evidence now available, thus triggering the full permitting process as GRE requested – doing so will increase certainty around the permitting schedule and save some amount of time leading up to the decision to order an EIS. Concurrently, the Commission could seek additional comment on the need for GRE to apply for a new Certificate of Need for this project, or it could wait to do so until after better alternatives have been vetted by an EIS.

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⁹ Available at [20225-185806-01](#). See *id.* at 4.

¹⁰ See GRE's earlier comment on the MEPA petition available at [20226-186336-01](#) (arguing that as soon as the Commission finds the potential for significant impacts to the environment the minor alteration cannot be granted and the full permitting process is triggered).