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Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101

Response to Comments: Petition of Xcel Energy to terminate a Power Purchase Agreement ,
etc. with Benson Power, LLC (Ex Fibrominn)

E002/M-17-530

Dear Mr. Wolf:

It is apparent that this matter touches on a complex matrix of entities, jurisdictions, and legal and environmental issues.

Various commenters want action delayed, and seek to muddy the waters.

The Benson project was promoted as a means of processing turkey litter, and claims were made that this would be beneficial compared to alternative means of litter management. But in practice the facility has not been able to obtain more than about one-half the litter needed, and about half its feedstock is wood.

This, it does not seem very convincing that the Turkey Growers Association says it wants a five year transition period to locate enough fields for land application.

The use of woody fuels has brought out comments from various forestry interests and the Department of Natural resources. But, the Benson facility was not envisioned as a means of creating markets for forestry interests.

The DNR speaks of "...contributions to Minnesota's green biomass industry." and says "Minnesota's renewable energy policy has worked to support environmental outcomes" But the DNR does not define "green" or identify the "environmental outcomes" it refers to.

I am sure that back in the 1990s when the "biomass mandate" deals were done, people thought "biomass" burning was a good idea, and a source of "clean energy." This has proven not to be the case, as I noted in previous comments, and meanwhile the economics of wind and solar power have greatly improved. Xcel energy does not need "biomass" capacity to meet its

“renewable” obligations. Thus is it sound public policy, and in the public interest, to support the shutdown of the Benson and other “biomass” burners.

Note, in another docket, the proposed shutdown of the troubled “Laurentian Energy Authority,” (Hibbing/Virginia public utilities) which was promoted not long ago with all sorts of positive claims that did not eventuate.

As a resident of Red Wing, and a neighbor of the Prairie Island Indian Community, my interests are impacted by the operation of Xcel’s Red Wing facilities, including the nuclear waste storage facility.

The exceptional mismanagement of the “Renewable Development Fund” has caused this feature of the 1994 deal to be more a nuisance than a remedy. It has been used to promote a new coal plant, to promote garbage incineration at Xcel’s Red Wing burner, and now is to be used to compensate the City of Benson for the consequences of the poultry litter burner debacle. This appears to be a “done deal,” done in the Legislature, and one can only request and hope that this money will not be used to create additional environmental problems.

The Legislature determined that:

The commissioner of employment and economic development shall conduct a study to examine the economic impact of the closure of a biomass facility located in the city of Benson that uses poultry litter to generate electricity. In conducting the study, the commissioner must analyze the impact of the closure of the biomass facility on employment and income in the local economy, including impacts on ancillary providers of goods and services to the biomass facility. The commissioner must report study findings to the legislature by February 15, 2018.

It is unfortunate, but undeniable, that the Legislature did not mandate consideration of impacts on health and quality of life. And, it does not appear that the PUC was intended to wait for the DEED study before taking action.

Thus, I support the essentials of the Xcel petition, and urge that the Benson burner be shut down as soon as possible.

The Commission has sufficient information, and sufficient direction from the Legislature, to justify prompt action.

Respectfully submitted,

[signed]

Alan Muller