



May 14, 2022

Dear Municipal Energy Agency of Nebraska Board and Staff,

The Colorado Renewable Energy Society (“CRES”) appreciates the opportunity to comment on the draft Integrated Resource Plan (“IRP”) developed by the Municipal Energy Agency of Nebraska (“MEAN”), available from <https://mean.nmppenergy.org/about/means-integrated-resource-plan>.

CRES very much appreciates the hard work that has gone into this draft IRP and the progress that MEAN is making in developing wind, solar, and distributed resources on its system. Thank you!

CRES is interested in the MEAN IRP because several Colorado communities including Glenwood Springs, Gunnison, Delta, Aspen, Fort Morgan, Fountain, Oak Creek, Center, Wray, and Lyons, are served by MEAN. CRES has members in many of these communities.

CRES would like to make the following suggestions for consideration by the MEAN Board and Staff:

1) Keep emphasizing development of renewable generation. The MEAN service territory in Nebraska, Colorado, Iowa, and Wyoming has excellent wind and solar resources, and the costs of these generation options have fallen dramatically in the last decade. As MEAN knows, there are also a number of interesting opportunities to develop small hydro resources. Increasing reliance on these “homegrown” resources in MEAN territory should lead to lower cost generation going forward. Combining these renewable resources with battery generation will help MEAN match renewable generation with load. In contrast, coal is a non-renewable fuel, which, in addition to producing air pollution and greenhouse gases, carries both availability and reliability risks that are likely to become increasingly apparent in the years ahead.

2) Set Interim Goals for MEAN’s Renewable Generation: Currently, the draft IRP has MEAN relying on its coal resources for approximately 50% of its energy generation until at least 2038. (See page 14 in the Draft IRP.) For environmental, economic and reliability reasons, we strongly urge MEAN to develop goals that will position MEAN and its customers for a 21st century clean energy grid.

3) Consider the Benefits of Locally Sited Generation and Islandable Systems as Extreme Weather Increases: Nebraska communities clearly understand the risks of floods and other extreme weather events such as blizzards and tornadoes. When extreme weather comes, it presents a significant risk to the transmission and distribution systems with utility customers often left without power—even when there is more than adequate generation available. Please consider the benefits of siting more generation locally, reducing reliance on vulnerable long-distance transmission and combining local generation with storage and “microgrid” controls that will allow local systems to “island” and continue to provide power in extreme weather events.

4) Continue to Develop Demand-Side and Efficiency Resources: As always, working to save and manage electricity use is often the lowest cost and cleanest way to serve customers, so we encourage MEAN to continue to develop demand-side resources, including demand flexibility and response options to help shave summer peaks and match the demand on MEAN’s system with the availability of low-cost wind and solar resources.

We appreciate the progress MEAN has made. We encourage you to keep working to develop an electrical system that will harvest the abundant wind, solar, and other renewable resources that you have in MEAN territory.

Thank you for this opportunity to comment on the MEAN Draft IRP.

Sincerely,

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on behalf of the
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