

Ms. Shannon Coleman
Supervisor, Resource Planning & Analysis
Municipal Energy Agency of Nebraska
8377 Glynoaks Drive Lincoln, NE 68516

Attn: MEAN_IRP@nmppenergy.org

May 13, 2022

COMMENT ON MEAN'S INTEGRATED RESOURCE PLAN

Dear Ms. Coleman:

This is a comment on MEAN'S draft Integrated Resource Plan dealing with the lack of community communication and concerns regarding MEAN's 2050 Vision.

Western Colorado University is a 4 year university located in Gunnison, Colorado. Being located on the Western Slope, the University strongly relies on its surrounding outdoor environment and makes a note to be a leader in environmental stewardship and creates a community that is environmentally aware and conscious: "[Western strives to be a leader in the greater Gunnison community by creating a sustainable campus and leading by example.](#)" The University accommodates about 3,000 students every academic year, and creates [450 jobs](#) in the Gunnison community and is the largest electrical consumer in the Gunnison Valley. The Sustainable Action Committee (SAC) is a group of staff, students, and faculty that leads initiatives surrounding campus sustainability practices.

As Gunnison's main consumer of electricity, SAC is concerned with MEAN's clearly lacking initiative in transitioning into renewable energy and the plan to continue increasing your reliance on coal well into 2030.

Out into 2038, MEAN's energy from coal is projected to remain constant at 50%. WAPA drops to 15% with the expiration of the WAPA Displacement Agreement. Renewables decrease to 8% as Wind PPAs, the Landfill Gas PPA, and the Shavano Falls Hydro PPA end. MEAN will require an estimated 27% of energy in 2038 from future resources.

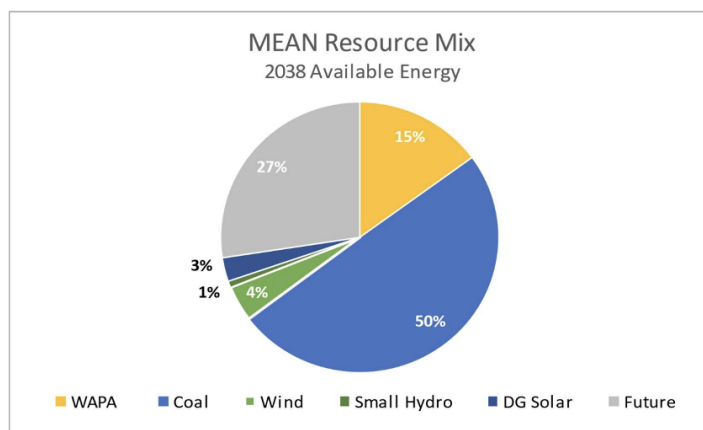


Figure VI-30

Although your goal is 2050, there are no interim goals set. There is no realistic plan to reach that 2050 goal. Like most of your members, we want to see an interim goal to reach the 2050 carbon neutral vision.

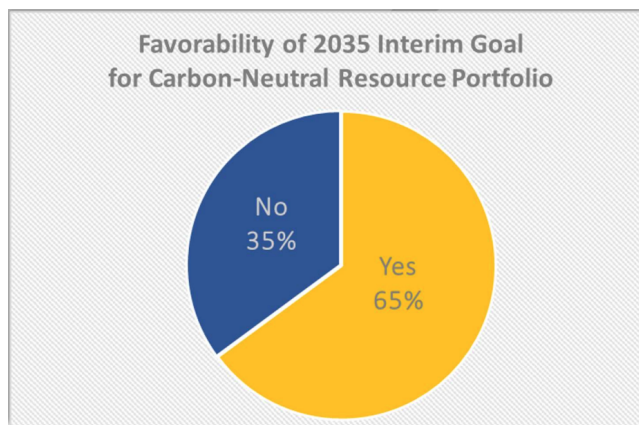


Figure IX-5

From what the IRP illustrates, we do not believe that MEAN is evaluating the full range of alternatives for reliable energy, which is one of the reasons WAPA requires these IRP's:

The IRP must evaluate the full range of alternatives to provide adequate and reliable service to a customer's electric consumers at the customer's or member's lowest system cost. Ideally, the planning process assesses new generating capacity, power purchases, energy conservation and efficiency, cogeneration and district heating and cooling applications and renewable energy resources. **Robust public involvement should be a part of the process, as well, allowing the utility to share upcoming**

challenges with its consumers and to get their input on solutions that best address the community's diverse wishes and concerns. (WAPA)

There is also concern regarding the public's involvement in the IRP and in data that is provided throughout the IRP. The phrase "When asked if the respondent's community..." on their survey questions. While it never exactly says so, We are concerned that 'community surveys' may be 'surveys' of MEAN's own Board of Directors, composed of one representative from each MEAN community. While there are many fine and knowledgeable people on the MEAN Board, they do not represent their communities as a whole. An example of our concern is included below:

B. Local Energy Goals

To determine how specific local energy goals correspond with MEAN's 2050 Vision, Participants were asked a number of related questions in the January 2021 online survey. Of the respondents, one third are interested in increasing their community's renewable portfolio. However, of those that indicated an interest in increasing their proportion of renewable energy, less than 25% are willing to pay a higher wholesale rate for lower emissions in their portfolio. When asked if the respondent's community would like to increase the carbon-neutral energy in their resource mix at an accelerated rate or concurrent with MEAN's progress toward the 2050 Vision of carbon neutrality, the overwhelming majority prefer to progress at the same rate as the overall organization.

There are little to no specifics of who is meant as a 'respondent' or what is meant as those 'respondents communities.' From what we understand these communities are those served by MEAN and as a community served by MEAN, we do not feel accurately represented.

Sincerely,

Dr. John Hausdoerffer, Western Community Member

Dr. Ricardo Vazquez, Assistant Professor of Environment and Sustainability (Sustainable Action Committee Member)

Ashely Woolman, Western Colorado University Sustainability Specialist (Sustainable Action Committee Member)

The Western Solar Society

The Western Sustainability Coalition