

Mr. Robert Poehling
Executive Director & Chief Executive Officer
Municipal Energy Agency of Nebraska
8377 Glynoaks Drive
Lincoln, NE 68516

May 13, 2022

MEAN Integrated Resource Plan

Dear Mr. Poehling,

In 2019, Colorado adopted House Bill 19-1261, the *Climate Action Plan to Reduce Pollution*, which included greenhouse gas pollution reduction targets of 26% by 2025, 50% by 2030, and 90% by 2050 from 2005 level. To ensure that the state is making progress toward meeting those goals, Governor Polis directed the Energy Office to work with other state agencies to develop a roadmap. This was released in January 2021 and calls for utilities to work toward meeting emissions of at least 80% by 2030. Utilities representing 99% of all fossil generation within Colorado have committed to meeting or exceeding this target; in fact, our largest utility, Xcel energy, has proposed a plan to our Public Utility Commission that will achieve approximately 85% reduction by 2030, and we anticipate all coal plants in the state to be retired by Jan 1, 2031. While our current regulatory requirements do not apply to the communities served by MEAN, due to the very small size of these communities, we would encourage MEAN to voluntarily achieve the same level of emissions reductions for power that is being imported into Colorado.

We appreciate MEAN's vision of working to achieve carbon neutrality by 2050. However, we also have concern with the process of public comment around this current resource plan and the extent to which MEAN is making progress toward more near-term GHG emissions reduction targets, which the IRP notes is supported by its board and two-thirds of members. The Energy Office supports the adoption of an interim target and expresses support for a resource plan that avoids the acquisition of new fossil generating units that may make it more difficult for MEAN to achieve its 2050 vision. Further, we would encourage MEAN to consider a resource plan that works to reduce reliance on coal-fired units, which can both lower emissions and lower costs to customers.

Sincerely,



Will Toor, Executive Director
Colorado Energy Office