

May 2, 2018

Mr. Darrell Nitschke
Executive Director
North Dakota Public Services Commission
State Capitol
600 E. Blvd. Ave.
Bismark, ND 58505-0480

Re: In the Matter of Petitions for Authority for Deferred Accounting to defer recognition of the transactional, plant closing and other associated costs of transactions proposed for Benson (Case No. PU-17-271); Advance Determination of Prudence (ADP) for proposed transactions relating to Power Purchase Agreements for the Benson Power biomass plant (Case No. PU-17-270); and Application for Authority for Deferred Accounting to defer recognition of costs of terminating the current PPA with Laurentian Energy Authority with a series of buyout payments (Case No. PU-17-322).

Case No. PU-17-270, PU-17-271 and PU-17-322

The Associated Contract Loggers & Truckers (ACLT) of Minnesota, a 501(c)(6) nonprofit trade association, established in 1989, submits the following Comments and requests a Consolidated Hearing in regards to the cases noted. The Associated Contract Loggers & Truckers (ACLT) of Minnesota represents over 200 timber industry related companies, including loggers, truckers, mills and equipment vendors that will all be impacted directly or indirectly by the Termination of the Benson Power / Xcel Energy biomass Power Purchase Agreement and the Termination of the LEA / Xcel Energy biomass Power Purchase Agreement. Additionally, all of the biomass suppliers affiliated with Benson Power and the majority of the suppliers affiliated with the Laurentian Energy Authority are members of the ACLT.

The following comments are submitted on behalf of the Minnesota timber industry as a whole, AND NOT ANY SPECIFIC OR INDIVIDUAL BIOMASS SUPPLIER, and the private and public land managers of Minnesota's timber lands as supported by the attached records.

As a result of the Settlement Agreement filed on January 18, 2018 by NSP and Advocacy Staff, with the NDPSC included an Advance Determination of Prudence for NSP's decision to terminate its PPA with Laurentian Energy Authority; and recovering the costs through NSP's automatic adjustment clause for Benson Power and Laurentian Energy Authority. Neither of these matters was the subject of any issue included in the November 29, 2017 notice. Therefore the proposed Settlement Agreement under consideration by the NDPSC includes two matters that were not the subject of the issues in the original notice.

68 PU-17-271 Filed 05/04/2018 Pages: 13
Comments and Request for Hearing with supporting documentation
Associated Contract Loggers & Truckers (ACLT) of Minnesota
Scott Dane, Executive Director

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Comments and Request for Hearing with supporting documentation
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Scott Dane, Executive Director

These issues are;

1. Is NSP's proposal to terminate its Power Purchase Agreement with Laurentian Energy Authority prudent?
2. Is it reasonable and appropriate to waive the provisions of the Automatic Adjustment Clause rule to permit recovery of the costs of the Benson Power, Pine Bend and Laurentian Energy Authority transactions through NSP's Automatic Adjustment Clause?

In regards to these issues, the Associated Contract Loggers & Truckers of Minnesota contends that it is not reasonable or appropriate to waive the provisions of the Automatic Adjustment Clause to permit recovery of the costs of Benson Power Plant Power Purchase Agreement Termination, acquisition of the Plant, closing of the Plant, and demolishing of the Plant. Nor is the termination of the Laurentian Energy Authority Power Purchase Agreement prudent.

This position is based on and supported by the following information:

1. NSP (Xcel Energy) testified in the Minnesota Public Utilities Commission Hearing that if the MNPUC did not approve a 9% return (\$20 million dollars) for their shareholders on the cost to terminate the PPA's then they would not culminate the transaction. Regardless of the projected \$600-\$700 million dollar benefit to their ratepayers which they based their filings on. This return to the shareholders on the termination costs from the ratepayers is not warranted, reasonable, or appropriate.
2. The public cost of the transaction exceeds the cost benefit to the purported ratepayers. The Minnesota Department of Natural Resources Economist issued a finding that the operation of the biomass facilities had approximately a \$75 million dollar annual economic impact, or \$750 million dollars over the remaining PPA period. Substantial additional public costs associated with forest health and the environment noted by the by the U.S. Forest Service, Superior National Forest Supervisor, the MNDNR Commissioner and St. Louis County add additional expense through increased fire danger, negative impacts to forest management, and other associated expenses. Documentation attached.
3. The Minnesota Department of Employment and Economic Development conducted a rudimentary Economic Impact Study of the closing of the Benson Power Plant and found a slightly positive economic impact. However, a response to the study noted many inaccurate assumptions and deficiencies that, when accounted for, reveal a negative economic impact. See attached response.
4. The MNPUC conceded that the restrictive legislative language that allowed Xcel Energy / NSP to petition for the termination of the PPA's and recovery of costs was

unusually restrictive and in essence “tied their hands” and did not allow for many of the public interests considerations commonly required for consideration in determining the comprehensive public benefit, impact and cost. If these factors could have also been considered it may have influenced a different outcome.

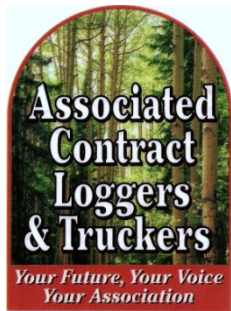
5. Perhaps most importantly, NSP (Xcel Energy) has negotiated a premium value of the Benson Power Plant, 50% above its determined value as evidenced through the bankruptcy filing and documents. Allowing NSP (Xcel Energy) to recover these overvalued costs at the expense of the ratepayers should not be permitted.
6. The Laurentian Energy Authority recognized that they were not going to be able to meet the contractual PPA requirements of biomass generated electricity, ie. An average threshold of biomass generated power over the term of the PPA, and were therefore going to be liable for a \$10 million dollar penalty. Xcel / NSP neglected to include that revenue in their filings which in essence equates to an additional \$10 million dollar deferred revenue to Xcel / NSP and adds \$10 million dollars to the buyout compensation paid to Laurentian Energy Authority.
7. In addition to these issues and costs, NSP / Xcel Energy has supported transfer of \$20 million to the City of Benson (2-4 times the property tax loss from the closure of the plant) and \$34 million to the cities of Hibbing and Virginia for the retirement of the bonds issued to build the biomass operations from the Renewable Development Fund. Xcel Energy has argued before the State Legislature that since the source of these funds is from Xcel Energy’s ratepayers, these funds are in essence Xcel Energy ratepayer funds and therefore an appropriate use. Accepting this argument, an additional \$54 million in PPA termination expenses must be considered.

Based on these factors, NSP’s / Xcel Energy’s proposal to terminate the Power Purchase Agreement with Laurentian Energy Authority is not prudent, and furthermore, due to the inflated costs of the PPA buyouts, acquisition of the Benson facility, demolishing of the Benson facility, deferred income, additional ratepayer funds (\$54 million) and other associated costs it is not reasonable or appropriate to waive the Automatic Adjustment Clause for the recovery of the costs associated with the buyout of the Benson Power and Laurentian Energy Authority PPA’s.

Therefore, the Associated Contract Loggers & Truckers of Minnesota requests consideration of these facts and the scheduling of a Hearing on the above referenced cases.

Respectfully Submitted,

Scott Dane
Executive Director
Associated Contract Loggers & Truckers of Minnesota
218-780-5927



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February 27, 2018

Commissioner Shawntera Hardy
Minnesota Department of Employment and Economic Development
1st National Bank Building
332 Minnesota Street, Suite E200
Saint Paul, MN 55101

Dear Commissioner Hardy:

On behalf of the truckers and suppliers serving the Benson biomass facility, we are writing to respond to the report issued by your department, as mandated by 2017 MN Session Law Chapter 94, Article 6, Section 3. We believe the report, "Economic Impact of Closure; Benson Power Biomass Facility," fails in its effort to fulfill the requirement established by the Legislature:

"...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 policy impact model (PI+ Version 2.1) which was employed by the Minnesota Department of Employment and Economic Development (DEED) does not measure the local effects on the communities, vendors, and ancillary providers affected by this legislation, as directed by the Legislature. Instead it uses a limited number of selected inputs (which appear to have been provided by Xcel Energy and the City of Benson) to gauge statewide impact on gross domestic product and jobs. The positive impacts identified in the model, by definition, do not accrue to the local areas impacted by the legislation. Xcel Energy rate reductions, when Xcel Energy's service territory is outside of Benson and the supplier/hauler network areas do not, and could not, impact the local area so we question their inclusion.

Additionally, the model uses an incomplete set of inputs. The model directly includes information about payments for biomass fuel and transportation services, job losses at the Benson facility, and job gains associated with a potential future construction project being proposed in the Benson area. However, the model ignores the full impact of those job losses, business closures, and other impacts that the supplier haulers and Turkey Growers attempted to provide to the department in preparation of this study.

With these deficiencies, the study fails on a number of fronts:

The way the study was performed understates the negative impact that would be caused by the loss of jobs associated with the production and delivery of biomass fuel and turkey litter. The analysis assumes that all of the affected businesses remain unaffected and that a new equilibrium will be achieved as equipment is redeployed to other activities. Without a new market demand for this low-value biomass product, the assumption that these businesses will remain viable is simply not true. Similarly, with no place to transport the turkey litter there will be a similar degree of job loss for those haulers.

As constructed, the model suggests a loss of only 171 jobs (in truck transportation, forestry, logging, fishing, hunting and trapping). The haulers and truckers have publicly estimated their job losses to be much greater (at least 330).

In addition to direct impacts, there are tertiary impacts to local businesses – from the local hardware store, auto repair shops, grocery stores, equipment dealerships, restaurants, schools, and other businesses supported by the logging and transport businesses and directly by their employees.

Because the model relies on standard algorithmic relationships to determine economic impact, it won't capture subtle effects. The haul distances associated with moving biomass fuel and poultry litter to Benson (up to 200 miles) are much greater than would be the case in a standard logging, or biomass, operation (around 50 miles). This difference means that a greater number of trucks and drivers are required to move the same amount of product. This difference explains the discrepancy between the job loss predicted by the model output and the estimates provided by the suppliers and haulers.

The job losses noted in the study are seemingly offset by job gains in industries and locations that will only marginally be realized within the Benson region. In fact, most of the job gain categories (air transportation, rental and leasing services, etc.) will be realized in the metro area, not Greater Minnesota.

The study model also fails to capture any pricing feedback associated with the sudden lack of demand for the biomass resource. The reduction in overall demand for biomass (that comes with closure of the Benson facility) will affect stumpage revenues received by the counties, state, U.S. Forest Service, and private landowners. This impact would be expected to have an impact in the millions of dollars annually. It would significantly offset the economic benefit projected in the study. This impact would not be limited to the low-value biomass resource but would also affect the entire timber market, as the cost to dispose of the unusable timber will increase, thereby lowering the revenues received for that portion of the resource mix. The only way to accurately predict this effect would be to have an economist analyze this specific impact.

Additionally, the study acknowledges that the impact of additional cost incurred by the U.S. Forest Service, Minnesota Department of Natural Resources (DNR), and counties is not captured in the analysis. The study also does not contemplate the negative environmental impact or costs of unhealthy forests, less quality timber being harvested, and increased chances of forest product lost to fire and disease that certainly could have been considered in this evaluation.

There was also no analysis to consider the new costs associated with removal of the low-quality wood waste from public lands. The DNR has publicly raised this concern and noted the possibility of increased public cost related to this removal. We know that without the market demand created by the Benson facility and with all other markets being gone from the state, market prices on this material will be rock-bottom and prices will increase for the biomass industry as a whole.

The report makes the assumption that lower energy production costs for Xcel Energy will result in lower rates for consumers. While this may, in fact happen, there is nothing in the original legislation that would require Xcel Energy to reduce rates and Xcel Energy has not indicated an intention to guarantee such a rate reduction. Even if that were a requirement, the result of closing the plant would benefit only Xcel Energy ratepayers and not all Minnesota taxpayers. We believe very strongly that a business decision by Xcel Energy should not put the needs of select ratepayers ahead of businesses in Greater Minnesota and the state taxpayers.

We believe that these omissions and assumptions skew the study's conclusion and we know that closing the plant will have a very strong negative economic impact to our state's and Greater Minnesota's local economies. We look forward to working with the department and the Legislature on rectifying these omissions and providing clarity on the state assumptions so that policymakers can analyze the true economic impact of the proposed closure of the Benson biomass facility.

Thank you for your consideration.

Sincerely,

On behalf of the Benson Power Suppliers and Hauler
Craig A Mataczynski, Principal
RedWillow Management LLC

CC: Neal Young, DEED
Rep. Garofalo, Chair, House Job Growth and Energy Affordability Policy and Finance Committee
Sen. Osmek, Chair, Senate Energy and Utilities Finance and Policy



Office of the Commissioner

Keith Nelson

January 18, 2018

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

Dear Mr. Wolf:

St. Louis County manages approximately 890,000 acres of state tax forfeited land for the economic, social and environmental benefit of its citizens and taxing districts. These lands are managed to provide an optimal combination of available resources by establishing practical resource management programs based on responsible stewardship and sustainability.

The use of forest biomass has great potential to provide a renewable, clean source of energy while investing in rural economies. Biomass production and utilization is important to St. Louis County's sustainable forest management program because it provides an outlet for non-marketable wood products, diseased and dead timber, and wind storm debris. Utilization of biomass improves forest health and productivity and reduces the risk of catastrophic wildfire in the region.

Biomass production is important to area loggers who have invested in equipment and personnel to harvest and deliver biomass to local markets; to local businesses which supply and maintain biomass equipment; and to local facilities which consume biomass for energy.

St. Louis County encourages the Minnesota Public Utilities Commission to consider the economic, environmental and public safety benefits of biomass utilization in any decision that is made regarding the biomass industry in Minnesota.

Sincerely,

Keith Nelson
Chair, St. Louis County Board of Commissioners



September 6, 2017

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

RE: In the Matter of Xcel Energy's Petition for Approval to Terminate the Power Purchase Agreement with Benson Power, LLC, Acquire the Benson Power Biomass Plant, and Close the Facility
PUC Docket Number: Docket No. E-002/M-17-530

The Minnesota Department of Natural Resources (DNR) recognizes that the official comment period for Public Utilities Commission (PUC) Docket Number E-002/M-17-530 has lapsed, but we ask that our comments and concerns be reviewed and considered regarding the amendment or termination of the power purchase agreement (PPA) between Xcel and Benson Power, LLC (BP). We write in our capacity as the state agency charged with managing Minnesota's forest resources for their multiple economic, environmental, and recreational purposes, including their contributions to Minnesota's green biomass industry.

Minnesota Laws 2017, Chapter 94, Article 10, Section 20 amended Minn. Stat. §216B.2424, potentially ends a 20-year commitment to biomass energy through the requirement for Xcel Energy to generate or purchase power produced using biomass. The potential disruption to existing biomass markets has a range of possible implications that should be thoroughly understood and considered before the PUC makes any decision to alter Xcel's existing obligations. DNR is concerned that the PUC does not have sufficient information on which to base an informed decision on terminating Xcel's PPA with BP. We believe that Xcel's economic analysis doesn't include costs associated with land management and logging and mill operations that are necessary to fully understand the true cost of terminating this PPA.

Losing biomass markets could have significant negative implications for the forest products industry. Specifically, loggers who currently supply the biomass market likely will not retire but will re-enter traditional logging markets. We anticipate this influx of new participants in traditional logging markets will increase competition for wood—i.e., wood buyers will bid up stumpage prices in order to win auctions and keep their equipment working. Increasing stumpage prices will put additional economic pressure on other loggers and mills that are already financially stressed. This would put Minnesota at risk of losing logger capacity. Once that capacity is gone, it is very difficult to replace. Also of significant concern, many of our mills are in tenuous financial situations. As the industry has emphasized in recent meetings with Governor Dayton and Lt. Governor Smith, rising stumpage prices could result in the loss of a mill(s). Minnesota mills are struggling to remain competitive in a global market. Stumpage prices, labor, and energy costs have long been the concerns of industry. It is essential to evaluate and better understand these potential implications for Minnesota's loggers and mills before making a decision that could profoundly disrupt the state's forest industry.

Another concern is that losing biomass markets would make responding to blowdown and insect/disease issues more costly for land managers. Without these biomass markets, land managers would have to pay someone to dispose of damaged and diseased trees, rather than utilize them. Access to biomass markets allows land managers to keep their land management costs within reach.

Xcel's analysis is limited to the cost of power. To the best of our knowledge, the current record does not include analysis or information regarding the economic impacts losing these biomass agreements would have on forest owners, loggers, and mills. Moreover, timber harvest is the primary means by which DNR and other commercial forest owners manage forests for their multiple values. Yet there has been no analysis of how the potential disruptions to timber markets would, in turn, affect forest health and recreation.

Due to this lack of a comprehensive analysis, DNR is concerned that the record before the PUC lacks sufficient information on which to base a decision to terminate or amend Xcel's power purchase agreement with BP. A more robust analysis should consider:

- lost logging and mill infrastructure.
- additional costs associated with managing woody residues at mills.
- lost forest management opportunities including hazardous fuel reduction and forest health sanitation efforts. and
- lost economic opportunities and costs associated with biomass facility closures.

Minnesota's renewable energy policy has worked to support environmental outcomes, foster economic development, and diversify Minnesota's power supply. Woody biomass has contributed to all of these policy goals, fostering infrastructure and energy development over the last decade. Terminating Xcel's agreements with BP would result in a severe decline in the state's production of renewable energy from wood biomass. A full economic analysis, including impacts to the logging, mill, and forest management sectors, is needed prior to a final PUC decision in these dockets.

Sincerely,



Tom Landwehr
Commissioner



Economic Impact of Closure: Benson Power Biomass Facility

February 2018

Total cost of salaries, printing, and supplies in
developing/preparing this report is \$10,411.09
(reported as required by Minn. Stat. 3.197)

Section 3: Equipment Investments—Beyond the Scope of This Study

Some suppliers submitted data on their past investments in equipment to serve the Benson Power biomass facility for the study. Such investments occurred at varying points, but all in the past (i.e., before 2018). In economic terms, they are a sunk cost, meaning that they cannot be recovered.

This study, like all economic impact studies, is a macroeconomic impact study, looking at impacts on industries and the state economy overall, rather than individual businesses. An analysis of the equipment investments of suppliers would be, by its nature, a very narrowly microeconomic undertaking and is outside of the scope of this study. In fact, this undertaking would require skills different from those of this study, namely financial and legal skills.

Due to the substantial value of investments made in equipment to serve the Benson Power biomass facility, valued in excess of \$100 million overall and over \$60 million since 2014, these sunk costs are worth noting. Some of the discussion of equipment costs is not related to the economic impacts of the closure. Instead, it relates to the idea of compensating suppliers who will be negatively impacted by the closure. However, in that situation, it would be critical to have financial and legal experts conduct a business-by-business analysis of these supplier investments. Some investments may have been made a decade or more ago, while others have been made in the past year or two. Some equipment may be very transferable to support other customers, which will allow for either reuse or resale. On the other hand, some equipment may be very specialized and have little or no reuse or resale value.

Section 4: About Economic Impact Analysis

Economic impact analysis is a form of macroeconomic analysis that examines the effect of an event on the economy in a specified area, measuring changes in business revenue, jobs, personal income and the size of the regional economy. In what is often called either a ripple effect or multiplier effect, increased economic activity triggers additional spending. The total impact is the sum of the direct, indirect and induced effects. The direct effect is the change that stimulates other activity; in this case, the decrease in jobs at the Benson Power biomass facility, as well as the changes in consumer and business spending due to decreased expenditures on electricity. The indirect effect is from industries reducing purchases of supplies and equipment from other industries due to decreased demand (for wood biomass, poultry litter and trucking suppliers). The induced effects is from changes in household wages and spending caused by the direct and indirect effects. The economic impact estimates in this memo include all three effects.

The Department of Employment and Economic Development (DEED) uses a statewide economic model built by Regional Economic Models Inc. (REMI) to conduct impact analysis of programs, various job creation proposals and legislative initiatives. REMI is a dynamic economic model that incorporates aspects of four methods: input-output, econometric, computable general equilibrium and new economic geography. Once the data is input, the

Executive Summary

The Benson Power biomass facility in Benson, Minnesota, burns a mix of poultry litter and wood to produce electricity. The 50 megawatt plant opened in 2007 to help Xcel Energy fulfill its mandate to purchase 125 MW of biomass electricity as part of 1994 legislation. Current power purchase agreements indicate that the plant will continue in operation through September 2028. However, the 2017 Minnesota Legislature passed a bill¹ allowing Xcel Energy to purchase and close the Benson Power biomass facility early.

This study² analyzes the economic impact of the early closure of the plant, as well as a number of other related economic impacts. For the 45 workers at the plant and for many of the plant's suppliers, the closure of the plant has a significant negative impact. However this study is intended to be an objective assessment of both the positive and negative effects of the closure. This includes negative impacts like the loss of 45 jobs at the Benson Power biomass facility and the loss of sales and increased costs for suppliers, as well as positive impacts like reduced electricity costs for consumers and businesses due to Xcel Energy's ability to purchase electricity from other sources at lower cost. The outputs in Section 2 are net economic impacts that balance both positive and negative impacts.

Although the impacts start with the loss of 45 jobs at the facility in Benson, the facility's suppliers are located across the state. Additionally, ratepayers benefitting from energy cost savings are also located across the state. As a result, this analysis was conducted for the entire state of Minnesota.³

In summary, this analysis shows that the closure of the Benson Power biomass facility would have a slightly positive net economic impact. That slight positive net economic impact would add jobs to the economy; even accounting for the loss of 45 jobs at the plant, the closure results in a net increase in jobs—ranging between a low of 53 jobs in 2018 to a high of 207 jobs in 2023. The positives of lower energy costs for consumers and businesses outweigh the negatives of the loss of 45 jobs at the Benson Power biomass facility and the loss of \$28.1 million in sales and increased costs for suppliers (of trucking, wood biomass and turkey litter) and result in a net positive employment impact. There are also net positive impacts on gross domestic product (size of the state economy) and personal income (wages and other payments to individuals). Overall, these impacts are small, relative to the scale of the state's economy. In 2016, total employment in Minnesota was about 3.7 million and gross domestic product was over \$339 billion, according to the U.S. Bureau of Economic Analysis.

Despite a positive net economic impact, there would still be substantial negative impacts, primarily on suppliers. The largest negative employment impacts would occur for trucking and for industries related to poultry litter and wood biomass suppliers. Industries that would experience growth as a result of the Benson Power biomass facility closure include construction, retail and services. Construction would grow due to spending \$20 million over four years in Benson on infrastructure, as well as construction of poultry litter storage. Other industries would grow due to reallocation of consumer spending due to reduced spending on electricity.

¹ 2017 Session Laws, Chapter 5

² Required by 2017 Session Laws, Chapter 94, Article 6, Section 26

³ The Regional Economic Models Inc (REMI) model used for this study does not allow impacts to be calculated just for the Benson area. All impacts presented in this study are statewide.

File Code: 2450
Date: September 13, 2017

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

RE: In the Matter of Xcel Energy's Petition for Approval to Terminate the Power Purchase Agreement with Laurentian Energy Authority I, LLC. PUC Docket Number: Docket No. M-17-551

Dear Mr. Wolf

The Superior National Forest has grave concerns over the potential loss of the biomass market Laurentian Energy Authority provides to Northeastern Minnesota and the Superior National Forest.

The Superior National Forest is concerned that the PUC does not have sufficient information on which to base an informed decision on terminating Xcel's power purchase agreements with Laurentian Energy Authority, LLC. We believe that Xcel's economic analysis doesn't include costs associated with land management, and economic impacts to loggers and local communities of Northern Minnesota. In addition, we do not believe the PUC realizes the importance of a biomass market for the purpose of removal of hazardous fuels from the Superior National Forest and Northeastern Minnesota in the form of biomass.

The removal of woody debris in the form of biomass plays a crucial role in hazardous fuels reduction on the Superior National Forest, which is the primary tool the Forest Service uses in preventing catastrophic wildfires. In the past several years several thousand tons of biomass has been shipped from the Superior National Forest to the LEA facilities, this equates to thousands of acres of hazardous fuels reduction through biomass removal.

With the ever increasing wind events, outbreaks of insect and diseases and the past practices of fire suppression the 3 million acre Superior National Forest is in a condition that requires the Forest Service to engage in a large hazardous fuels reduction program. With the loss of the biomass market the cost of this program would increase significantly due to the requirement of having to dispose of the material using alternate methods. These methods are both costly to the tax payer and provide additional risks.

In conclusion, the Superior National Forest believes the Minnesota PUC should engage in a more comprehensive analysis on the economic and environmental affects the termination of the power purchase agreements would have on Northern Minnesota and the Superior National Forest.

Sincerely,



for
CONSTANCE CUMMINS
Forest Supervisor

