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Hon. Dan Sripps, Chairman, Commissioners and Michigan Public Service Commission Staff
January 11, 2022

Thank you for convening this Hearing to consider the Upper Michigan Energy Resources Corporation's (UMERC's) proposed Integrated Resource Plan (IRP). We encourage approval of UMERC's IRP in Case No. U-21081.

The UMERC IRP calls for "the addition of 100 MW of solar generation" to complement its 168 MW gas-fired RICE generators in Negaunee and L'Anse, while UMERC plans to "continue its waste reduction ... programs, reducing UMERC's air emissions...and displacing forecasted higher-cost market energy purchases" (p 5, IRP filing).

In fact, there is a local project that will fit well within the Commission's timeline for this need, and which is already under development – the Superior Solar Project www.superiorsolarproject.com. The SSP will help UMERC to better serve its customers and the Community, creating 200 construction jobs, paying \$10-15 million in new property tax and achieving UMERC's stated goals:

- On-time, on-budget COD, because the SSP has earned significant Community Support and achieved unanimous approvals from Marquette County and Sands Township for its Solar Energy Systems Zoning. Sands Township then unanimously approved the SSP Special Use Permits in December 2020.
- Diversifying UMERC's portfolio with renewable energy located the Upper Peninsula will provide competitive pricing, reliability, mitigating UMERC's supply cost risks, adding "voltage support, and adding new capacity, as UMERC asserts it will "need if Cleveland Cliffs Empire Mine is reopened" (K. Kelley's 10/15/21-filed UMERC IRP Testimony).
- Achieving Climate/Carbon reduction goals filed by UMERC: Governor Whitmer's Executive Directive 2020-10 would cut greenhouse gas emissions 26-28% below 2005 levels in by 2025 [Governor Whitmer Announces Bold Action to Protect Public Health and Create Clean Energy Jobs by Making Michigan Carbon-Neutral by 2050](#). (cited in R. Greco's 10/15/21-filed UMERC IRP Testimony)

In conclusion, I encourage the Commission to grant approval of UMERC's IRP in Case No. U-21081. Thank you.

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