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December 17, 2012

Burl W. Haar
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E015/CN-12-1163

Dear Dr. Haar:

Attached are the comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the following matter:

Petition for Exemption from or Confirmation of Certain Filing Requirements - In the Matter of the Request by Minnesota Power for a Certificate of Need for the Great Northern Transmission Line.

The petition was filed on November 20, 2012. The petitioner is:

David R. Moeller
Senior Attorney
Minnesota Power
30 West Superior Street
Duluth, MN 55802
(218) 723-3963
dmoeller@allete.com

The Department recommends that the Minnesota Public Utilities Commission (Commission) **approve in part and deny in part** the Company's Exemption Petition as requested herein and require the Company to provide data and information as requested herein.

The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ SACHIN SHAH
Rates Analyst

SS/jl
Attachment

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

COMMENTS OF THE
MINNESOTA DEPARTMENT OF COMMERCE
DIVISION OF ENERGY RESOURCES

DOCKET NO. E015/CN-12-1163

I. BACKGROUND

On October 29, 2012 Minnesota Power (MP or the Applicant) filed MP's *Notice Plan Petition In the Matter of the Request by Minnesota Power for a Certificate of Need for the Great Northern Transmission Line* (Notice Petition). The Notice Petition provided MP's proposed notice plan for a 500 kilovolt (kV) transmission line to be located between the province of Manitoba in Canada and the Blackberry Substation in Itasca County, Minnesota (approximately 225 to 300 miles), and a 345 kV double circuit transmission line between the Blackberry Substation and the Arrowhead Substation in St. Louis County near Hermantown, Minnesota (approximately 50 to 70 miles) (Project). The transmission line is intended to provide delivery and access to power generated by Manitoba Hydro's hydroelectric stations in Manitoba, Canada.

The Notice Petition proposed a plan to notify potentially affected members of the public about the proposal, under Minnesota Rules part 7849.2550. In response to the Notice Petition, comments were filed by the Minnesota Department of Commerce-Division of Energy Resources (Department) and Carol Overland. MP filed reply comments on December 10, 2012. The Notice Petition is currently pending before the Minnesota Public Utilities Commission (Commission).

On November 20, 2012 MP submitted the Company's *Petition for Exemption from or Confirmation of Certain Filing Requirements Regarding the Great Northern Transmission Line* (Exemption Petition) requesting exemptions from certain data requirements of Minnesota Rules part 7849. In response to the Exemption Petition, on December 3, 2012 the Commission issued a notice specifying that comments are due December 16, 2012¹ and reply comments are due January 16, 2013.

Below are the comments of the Department on the Exemption Petition.

¹ The Department notes that December 16th, 2012 is a Sunday; hence comments are due on December 17th, 2012.

II. DEPARTMENT ANALYSIS

A. INTRODUCTION

The proposed facilities described above qualify as large energy facilities (LEF) under Minnesota Statutes §216B.2421, subd. 2 [(2) and (3)]. Minnesota Statute §216B.243, subd. 2 requires that LEFs obtain a Certificate of Need (CN). Minnesota Rules part 7849 includes the filing requirements for a CN for an electric transmission facility.

The Notice Petition states that the proposed Project would strengthen regional reliability and is needed:

- to deliver at least 250 MW of energy and capacity by June 1, 2020 under a Power Purchase Agreement (PPA) approved by the Commission in Docket No. E015/M-11-938;
- to provide access to renewable energy for MP and the region;
- to serve increased industrial load growth on the Iron Range; and
- to facilitate increased imports from Manitoba of up to 1,100 MW to support the regional transmission system and to serve load.

B. MP'S REQUEST

In the Exemption Petition, MP requested that the Commission grant certain exemptions from or clarifications to the requirements of the CN rules. Specifically, MP requested exemption from providing data relevant to the following portions of Minnesota Rules:

- 7849.0260, Subp. A(3) and C(6); Line Losses;
- 7849.0270, Subp. 1, 2; Forecasting; System-Wide Data;
- 7849.0270, Subp. 2 (B and C); Customer Class Information;
- 7849.0270, Subp. 2(E); System Revenue Requirements;
- 7849.0270, Subp. 2(F); Weekday Load Factor;
- 7849.0280, (B) through (G) and (I); System Capacity;
- 7849.0290; Conservation;
- 7849.0300; Consequences of Delay; and
- 7849.0340; No-Facility Alternative.

Minnesota Rules 7849.0200 states that an exemption is appropriate if the data requirement is not necessary to determine the need or is obtained via another document:

Before submitting an application, a person is exempted from any data requirement of parts 7849.0010 to 7849.0400 if the person (1) requests an exemption from specified rules, in writing to the commission, and (2) shows that the data requirement is unnecessary to determine the need for the proposed facility or may be satisfied by submitting another document. A request for

exemption must be filed at least 45 days before submitting an application. The commission shall respond in writing to a request for exemption within 30 days of receipt and include the reasons for the decision. The commission shall file a statement of exemptions granted and reasons for granting them before beginning the hearing.

The Department notes that the applicant bears the burden of proving the claimed need of the proposed project. In the Commission's July 24, 2006 ORDER GRANTING EXEMPTIONS, *In the Matter of the Application for Certificates of Need for Three 115 kV Transmission Lines in Southwestern Minnesota*, in Docket No. E002/CN-06-154, the Commission stated in part the following:

It should be understood that no decision the Commission makes regarding Xcel's exemption request will preclude any person from recommending, or the Commission from requiring, the submission of additional information before finding the Certificate of Need application substantially complete. Moreover, no finding that an application is substantially complete, with or without additional information, would preclude the development of additional information through discovery. Ultimately the burden of proving need for the proposed facility lies with the applicant. The exemptions granted here relate to filing requirements only; they are not findings that the information at issue may not prove essential to finding need. Such substantive findings would require careful examination of the merits of the application².

In summary, the exemptions and clarifications the Applicant requested in its Exemption Petition relate to filing requirements only; the burden of proving the claimed need for the proposed Project remains with the Applicant. With that understanding, the Department examines below each specific exemption request separately.

² *In the Matter of the Application by Koch refining Company for Certification of the Pine Bend Cogeneration Project*, Docket No. IP-2/CN-95-1406 ORDER GRANTING EXEMPTIONS FROM FILING REQUIREMENTS (February 16, 1996); *In the Matter of the Application of Rapids Power LLC for a Certificate of Need for its Grand Rapids Cogeneration Project*, Docket No. IP-4/CN-01-1306 ORDER GRANTING EXEMPTIONS FROM FILING REQUIREMENTS, PERMITTING EXPEDITED FILING, AND EXTENDING PERIOD TO DETERMINE ADEQUACY OF FILING (October 9, 2001) at 3-4; *In the Matter of the Application of Great River Energy for a Certificate of Need for a High Voltage Transmission Line*, Docket No. ET-2/CN-02-536 ORDER GRANTING AND DENYING EXEMPTION REQUESTS AND CLARIFYING FILING REQUIREMENTS (July 2, 2002) at 7; *In the Matter of the Application of Northern States Power Company d/b/a Xcel Energy and Dairyland Power Cooperative for a Certificate of Need for a High Voltage Transmission Line*, Docket No. ET-3, E-002/CN-02-2052, ORDER GRANTING EXEMPTION IN PART AND REQUIRING SUPPLEMENTARY FILING AND NOTICE (April 8, 2003) at 8.

C. ANALYSIS OF EXEMPTION REQUESTS

1. *Minnesota Rules 7849.0260, subp. A(3) and C(6)*

These rules require an applicant to provide estimated “losses under projected maximum loading and under projected average loading in the length of the transmission line and at the terminals or substations.” MP proposes to supply system loss information in lieu of line-specific losses for the Project and other transmission options considered. As mentioned above, the Project according to MP is needed because of increased industrial load growth, for MP’s PPA, and to support the regional transmission system.

In this proceeding, the Department agrees that line losses for the system will be more relevant to the analysis than line losses for individual lines. System losses are especially relevant when considering new transmission the length and capacity of the facilities proposed by the Applicant. The Department notes that, to make the proper decisions in a societal framework, it is necessary to know what happens to system losses when a line is added. To count only the losses on the line in question might lead to the selection of an alternative because of its lower losses in spite of the potentially higher system line losses; therefore selection of such an alternative would force the system to produce more energy than some other alternative. Thus, the proposal to provide line loss data for the system as a whole is appropriate in this proceeding.

In summary, the Department recommends that the Commission approve MP’s proposed exemption to Minnesota Rules 7849.0260 A(3) and C(6) with the provision of the proposed alternative data.

2. *Minnesota Rules 7849.0270, subps. 1 and 2*

These rules require an applicant to provide information regarding its system peak demand, annual energy consumption, and load factors for the applicant’s service area and system. According to MP, this exemption was requested because the proposed facility is intended to provide generator transfer capabilities for Manitoba Hydro generation resources; therefore the need is not related to MP’s system peak demand, annual energy consumption, or load factor. MP also stated the following:

Resource plans before the Commission and regional planning studies³ indicate that over the coming decades, baseload generation resources will be removed from utility fleets, primarily due to age of, and forthcoming environmental regulations for, certain coal generating units. Utilities in Minnesota and the region could very well need to replace those baseload resources. Generation resources from Manitoba Hydro have been identified as reasonable to replace those baseload resources. Existing transmission lines

³ Minnesota Power’s footnote states that the Company will separately address the Department’s November 19, 2012 Comments on the Notice Plan related to the MISO studies therein. The Department notes that it will separately address MP’s December 10, 2012 *Reply Comments* on the Notice Plan.

between Manitoba Hydro's facilities and Minnesota are at capacity and additional transmission resources must be constructed to increase the baseload resources that can be purchased from Manitoba Hydro.

Instead, MP proposed to provide data and information:

- on the transfer capability requirements that are necessary to import generation from Manitoba Hydro;
- on currently proposed and projected retirements of baseload facilities in the upper Midwest that likely will create a need for other baseload resources to be identified and readily available; and
- on the analysis reviewed by the Commission when it approved Minnesota Power's PPA with Manitoba Hydro for 250 MW related to Minnesota Power's own energy needs.⁴

While the Department notes that the data and information MP proposed to provide may be appropriate regarding the regional and integrated transmission network, and does not oppose its provision, MP has also claimed that the Project is needed for increased industrial load growth in the Iron Range and for its PPA with Manitoba Hydro. As a result, MP should not be exempted from providing its system peak demand, annual energy consumption, and load factors for the applicant's service area and system, as required by the above Minnesota Rule. In addition, MP should provide the proposed alternative data as well. The Department notes that if MP has alternative data that is more relevant than the required system forecast data to the claimed needs of serving increased industrial load in the Iron Range and the PPA with Manitoba Hydro, then MP should propose to provide that data in reply comments.

In summary, the Department recommends that the Commission deny MP's proposed exemption to Minnesota Rules 7849.0270, subps. 1 and 2.

3. *Minnesota Rules 7849.0270, subps. 2(B) and 2 (C)*

These rules require an applicant to provide information regarding system consumption by customer class for each of the forecast years. MP requested this exemption since:

... the data is not material to establishing the need for a proposed transmission line, because transmission needs are based on aggregate customer demand regardless of how much any particular class of customer contributes to that demand. The proposed methodology of using historic loading and the system forecast growth rates does not require the breakout of the customers by class.

⁴ On February 1, 2012 the Commission in its Order, *In the Matter of Minnesota Power's Request for Approval of a Power Purchase Agreement with Manitoba Hydro Company*, in Docket No. E-015/M-11-938 approved MP's proposed PPA with Manitoba Hydro.

The Department notes that the data MP proposed to provide, “historic loading and the system forecast growth rates,” may be appropriate data to have in the record to describe the Applicant’s system and its relationship in the integrated regional transmission system. However, the “historic loading and the system growth rates” should be at a detailed substation-specific level. The Department further notes that provision of information regarding substation forecast methodology, databases, and assumptions may be appropriate not only to validate the claimed need of supporting the regional transmission system but also to verify MP’s claim that “[e]xisting transmission lines between Manitoba Hydro’s facilities and Minnesota are at capacity.” However, for all the reasons mentioned above and herein, MP should not be granted an exemption to the requirements of the rules given the other claimed need “of increased industrial load.” Thus, the Applicant should provide the proposed alternative data in addition to the data required by Minnesota Rules.

In summary, the Department recommends that the Commission deny MP’s proposed exemption to Minnesota Rules 7849.0270, subp. 2 (B and C).

4. *Minnesota Rules 7849.0270, subp. 2(E)*

This rule requires the applicant to provide an estimate of the annual revenue requirement per kilowatt-hour, in current dollars, for the utility’s system for each forecast year. Since this information is a product of a least-cost alternative analysis, the Department does not need to use this information to analyze the CN application. However, as the Department has noted in previous exemption request comments,⁵ this information is useful to show the potential rate impact of the project to non-technical audiences. The Applicant stated that:

... final ownership splits between MP and other entities have not been finalized and the annual revenue requirement impact of the Project is dependent on a number of factors including which customers Manitoba Hydro ultimately sells power to through the utilization of those transmission lines and regulatory filings to be submitted to the Federal Energy Regulatory Commission (“FERC”). Furthermore, the proposed line is planned to be a participant funded facility.

The Applicant proposed to provide a description of how MISO spreads wholesale electricity costs among users of the transmission grid on a participant funded basis, along with general estimates of how the cost of the Project would affect the ratepayers of MP. The Department supports MP’s proposal to provide this alternative information. The Department notes that general estimates of how the cost of the Project would affect ratepayers of the other entities, if those entities are utilities, once the ownership splits are finalized are also relevant to this proceeding. As a result, the DOC recommends that the Commission grant the Applicants’ request; further, the Department puts MP on notice that the Department will seek additional relevant cost data in the record.

⁵ See for example, Docket Nos. ET-2, E002/CN-06-1115; E017, E015/CN-07-1222; and ET2, E015/CN-10-973.

5. *Minnesota Rules 7849.0270, subp. 2(F)*

Minnesota Rules 7849.0270, subp. 2(F) requires average system weekday load factors for each month. The Applicant stated that load factor is not relevant when evaluating the need for a transmission facility. The Department agrees with MP's assessment and recommends that the Commission grant the Applicant's request.

6. *Minnesota Rules 7849.0280*

This rule requires the applicant to provide information that describes the ability of its existing system to meet forecasted demand; in essence, load and capability (L&C) information. The Applicant requested confirmation that the requirements of Minn. Rules 7849.0280 as applied to a transmission facility are satisfied using data and information that relates back to Minnesota Rules 7849.0270. The Department agrees with MP that the Applicant's proposed discussion, focusing on transmission adequacy, is more relevant than the required data, which focuses on generation adequacy. The Commission has noted in the past that much of Minn. Rule 7849.0280 pertains to electric generators.⁶ The Applicant requested an exemption from the requirements of paragraphs B through G and I as those sections apply to generators and not transmission proposals. The Applicant noted that the remaining requirements of Minn. Rule 7849.0280, subps. A and H, are relevant to this proceeding. Paragraph I of the rule requires the following:

a discussion of the appropriateness of and the method of determining system reserve margins, considering the probability of forced outages of generating units, deviation from load forecasts, scheduled maintenance outages of generation and transmission facilities, power exchange arrangements as they affect reserve requirements, and transfer capabilities.

Since the Applicant has proposed to provide information and data on the transfer capability requirements under Minnesota Rules 7849.0270, subps. 1 and 2, the Applicant should not be granted an exemption from the requirements of Minnesota Rules 7849.0280, paragraph I. The Department recommends that the Commission grant the Applicant's exemption request for only parts B through G. In addition to this information, the Department requests that the Applicant provide data describing existing generation, and any planned additions and retirements, in the integrated regional transmission system. This information would be helpful to assess the ability of the proposed lines to accommodate generation needs.

7. *Minnesota Rules 7849.0290*

This rule requires the applicant to provide conservation program information and quantification of the impact of conservation programs on forecast data. Instead MP proposed the following:

This Project will serve customers throughout the state and region.
The forecast used by Minnesota Power accounts for conservation

⁶ Id.

reductions identified in its Resource Plan forecasts. Conservation and efficiency information is examined in detail in the resource planning process. All of the information requested by this Rule is contained in Integrated Resource Plan and Conservation Improvement Plan (“CIP”) filings. Instead of replicating that information in this application, Minnesota Power proposes to present a summary of the investigations along with references to the 2013 Integrated Resource Plan that must be filed by March 1, 2013. This will allow interested parties to pursue their investigation into this issue further through those materials if they wish. Minnesota Power will also supplement this Docket with CIP information to be filed in 2013.

As with section II C 2 through 5 above (forecast data), the Department notes that the data MP proposed to provide is appropriate data regarding the need to address increased industrial load. Such information should include any available conservation programs that could reduce energy use in the Applicant’s service territory. Thus, MP does not expect the complete conservation information to be available until March 1, 2013. In addition, once the final ownership splits between entities are known, information regarding conservation programs available to customers of the other respective entities and quantification of the impact of those conservation programs on forecast data will also be relevant to this proceeding. Therefore, the Department recommends that the Commission grant the exemption with the provision of the proposed alternative data; further, the Department puts MP on notice that the Department will seek additional relevant conservation-related data in the record.

8. *Minnesota Rules 7849.0300 and 7849.0340*

Minnesota Rules 7849.0300 requires detailed information regarding the consequences of delay on three specific statistically based levels of demand and energy consumption. Minnesota Rules 7849.0340 requires a discussion of what the impact would be on existing generation and transmission facilities at three levels of demand specified in part 7849.0300 for the no-build alternative. MP stated that it fully intends to discuss issues related to delay of the facility.

The Applicant also stated the following:

Since the Project is intended to provide additional resources to the region, Minnesota Power proposes instead to provide information on the transfer capability requirements that are necessary to allow importation of reliable baseload generation from Manitoba Hydro and what delay in facilitating additional transfer capabilities will mean to Minnesota and the region. Further, Minnesota Power will provide information on currently proposed and projected retirements of baseload facilities in the upper Midwest that create a need for other baseload resources to be identified and be readily available and if delay in the Project will have any consequences for decisions to be made on Minnesota Power’s system. Minnesota

Power will also provide information on the consequences of a delay or no facility alternative to the contractual obligations under the Commission approved 250 MW PPA with Manitoba Hydro. This alternative analysis is consistent with the Commission's decision in the 345 kV Projects Exemption Order where the Commission narrowed the range of scenarios that the applicants were required to address. *See* 345 kV Projects Exemption Order at 16-17.

In other words, instead of the rule-required discussion, MP proposed to provide information on the transfer capabilities and information on proposed and projected retirements of baseload facilities in the context of the potential impacts of delay on the reliability of the integrated regional transmission system.

The Department notes that the Applicant's proposed data substitution, focusing on the regional transmission system, is relevant to the claimed need. Therefore, the Department recommends that the Commission grant the exemption request to substitute the required information with the proposed alternative data.

9. *The Applicant*

MP asked the Commission for a designation that MP is the appropriate applicant for the Certificate of Need application. As is mentioned above, MP has stated that final ownership splits between MP and other entities have not been finalized yet. The Commission addressed a similar issue in another proceeding, noting that the statutes and rules "focus more attention on the importance of demonstrating need than on the identity of the demonstrator."⁷ MP stated the following:

As was done for CapX2020, Minnesota Power recognizes that final business arrangements for the Great Northern Transmission Line are not yet finalized. Similar to what the Commission approved for CapX2020, Minnesota Power will provide in its CoN a list of likely participants with ownership interests each participant will likely take in the Project. Upon finalization of the ownership structure Minnesota Power will submit a compliance filing. Minnesota Power also commits to providing all necessary information for the Commission and stakeholders to assess impacts of ownership structure on Minnesota Power's ratepayers.

The Department notes that the burden of proof to show that the proposed facility is needed rests on the applicant(s) in the CN proceeding. Therefore, in practice a designation of applicant(s) in the CN proceeding, which may be different from the final ownership structure, should not be viewed as reducing the applicant(s) burden of proof in the CN proceeding. The Department will

⁷ Docket No. ET-2, E-002, et al./CN-06-1115, ORDER DESIGNATING APPLICANTS AND SETTING FILING REQUIREMENTS at 4.

treat the eventual applicant(s) as the sole owner(s) of the Project for which the application is filed. If and when the applicant(s) determines that the proposed project should have additional or substitute owners, MP must make a filing with the Commission as contemplated by law. See Minn. Stat §216B.50; Minn. Rules, pt. 7849.0400, subp. H.

10. General Observations and Requests

As indicated above, MP listed reasons why the Company believes that the proposed Project is needed. The Department in its November 19, 2012 Notice Plan Comments stated the following:

Regarding the regional implication stated by MP, the Department notes that the Midwest Independent System Operator (MISO), through its Northern Area Study Technical Review Group's (TRG) and in the Manitoba Hydro Wind Synergy Study, is examining the issue of imports from Manitoba and the effects of those imports on associated transmission lines.

MP has proposed to provide data and information:

- on the transfer capabilities that are necessary to allow importation of generation from Manitoba Hydro;
- on currently proposed and projected retirements of baseload facilities in the upper Midwest that likely will create a need for other baseload resources to be identified and readily available; and
- on the analysis reviewed by the Commission when it approved Minnesota Power's PPA with Manitoba Hydro for 250 MW.

While the Department understands that the following are not filing requirements, based on the above, with regards to the regional implications of the project and the integrated regional transmission system, the Department requests that the Commission require the Applicant to provide detailed data, information and explanation of all of the effects, costs, benefits, and drawbacks of the proposed project on other utilities in the state (and their customers) as well as the region.

In addition, the Commission in its February 1, 2012 Order, *In the Matter of Minnesota Power's Request for Approval of a Power Purchase Agreement with Manitoba Hydro Company*, in Docket No. E-015/M-11-938, required MP, within one year of the date of the Order and annually thereafter until the start of the agreement, to file a report in that docket on various significant milestones achieved regarding the new hydraulic generating facilities and the new major transmission facilities. The Department requests that the Commission require the Applicant to file the same information concurrently in these proceeding as what MP is required to file in the PPA docket.

III. DEPARTMENT RECOMMENDATION

The Department concludes that the Applicant bears the burden of proving the claimed need for the proposed project. The exemptions and clarifications requested relate to filing requirements only. The Department recommends that the Commission approve the following requested exemptions, including any proposed provision of alternative data as listed below:

- 7849.0260, Subp. A(3) and C(6); Line Losses – MP should provide system data;
- 7849.0270, Subp. 2(E); System Revenue Requirements – MP should provide a description of how MISO spreads wholesale electricity costs among users of the transmission grid on a participant funded basis, and general estimates of how the cost of the Project would affect the ratepayers of MP. MP should also provide general estimates of how the cost of the Project would affect ratepayers of the other entities, if those entities are utilities, once the ownership splits are finalized;
- 7849.0270, Subp. 2(F); Weekday Load Factor;
- 7849.0280, (B) through (G); System Capacity – MP should provide data for subps. A and H,;
- 7849.0290; Conservation - MP should provide the proposed alternative data and in addition, once the final ownership splits are known between entities, the other respective entities should also be required to file the conservation program information and quantification of the impact of conservation programs on forecast data;
- 7849.0300 and 7849.0340; Consequences of Delay and No-Facility Alternative – MP should provide the proposed alternative data and information on:
 - the transfer capability requirements that are necessary to import generation from Manitoba Hydro and what delay in facilitating additional transfer capabilities will mean to Minnesota and the region;
 - currently proposed and projected retirements of baseload facilities in the upper Midwest that likely will create a need for other baseload resources to be identified and readily available and if delay in the Project will have any consequences for decisions to be made on Minnesota Power's system; and
 - the consequences of a delay or no facility alternative to the analysis reviewed by the Commission when it approved Minnesota Power's PPA with Manitoba Hydro for 250 MW related to Minnesota Power's own energy needs.

The Department recommends that the Commission deny the proposed exemptions listed below:

- 7849.0270, Subp. 1, 2; Forecasting; System-Wide Data; however, MP should also provide the proposed alternative data;
- 7849.0270, Subp. 2 (B and C); Customer Class Information; however, MP should also provide the proposed alternative data at the detailed substation-specific level; and
- 7849.0280, (I); System Capacity.

The Department concludes that the record in this proceeding should also include the following information:

- data describing the existing generation, and any planned additions and retirements, in the integrated regional transmission system. This information would be helpful to assess the ability of the proposed lines to accommodate generation needs;
- detailed data, information and explanation of all of the effects, costs, benefits, and drawbacks of the proposed project on other utilities in the state (and their customers) as well as the region; and
- the same information concurrently in these proceeding as what MP is required to file in the PPA docket.

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CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce
Comments**

Docket No. E015/CN-12-1163

Dated this 17th of December, 2012

/s/Sharon Ferguson

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Wanda	Davies	wdavies@windpower.com	Gamesa Energy USA, Great Plains Region	3001 Broadway St. NE, Suite 695 Minneapolis, MN 55413	Paper Service	No	OFF_SL_12-1163_CN-12-1163

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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Jenny	Frost	N/A	Ulteig Engineers	c/o Jason Hoskins 4285 Lexington Ave N Saint Paul, MN 55126	Paper Service	No	OFF_SL_12-1163_CN-12-1163
Travis	Germundson	travis.germundson@state.mn.us		520 Lafayette Rd Saint Paul, MN 55155	Electronic Service	No	OFF_SL_12-1163_CN-12-1163
Curt, Mary Pat	Gohmann	N/A		35123 County Road 2 St Joseph, MN 56374	Paper Service	No	OFF_SL_12-1163_CN-12-1163
Elizabeth	Goodpaster	bgoodpaster@mncenter.org	MN Center for Environmental Advocacy	Suite 206 26 East Exchange Street St. Paul, MN 551011667	Paper Service	No	OFF_SL_12-1163_CN-12-1163
Floyd	Guajardo	N/A	PennWell Corporation	1455 West Loop S Ste 400 Houston, TX 77027-9501	Paper Service	No	OFF_SL_12-1163_CN-12-1163
Burl W.	Haar	burl.haar@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_12-1163_CN-12-1163
Heidi	Hahn	N/A		4778 Chester Ave Webster, MN 55088	Paper Service	No	OFF_SL_12-1163_CN-12-1163

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Eric	Hansen	N/A	Pinnacle Engineering Inc.	11541 95th Ave N Maple Grove, MN 55369	Paper Service	No	OFF_SL_12-1163_CN-12-1163
Linda	Hanson	elcsh5@yahoo.com	W.O.L.F., Inc.	W1806 Wilson Road Hawkins, WI 54530	Paper Service	No	OFF_SL_12-1163_CN-12-1163
Randy, Rose	Haseleu	N/A		420 Hoyt Ave S Springfield, MN 56087	Paper Service	No	OFF_SL_12-1163_CN-12-1163
Vickie	Hessenius	N/A	CERTs	69144 270th St Dexter, MN 55926	Paper Service	No	OFF_SL_12-1163_CN-12-1163
Margaret	Hodnik	mhodnik@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_12-1163_CN-12-1163
Rick	Howden	N/A	Congressman Tim Walz	227 E Main St Ste 220 Mankato, MN 56001	Paper Service	No	OFF_SL_12-1163_CN-12-1163
Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_12-1163_CN-12-1163
Jodi	Johnson	jjohnson@mnpower.com	Minnesota Power	30 W. Superior St. Duluth, MN 55802	Paper Service	No	OFF_SL_12-1163_CN-12-1163
John A.	Knapp	jknapp@winthrop.com	Winthrop & Weinstine	Suite 3500 225 South Sixth Street Minneapolis, MN 554024629	Paper Service	No	OFF_SL_12-1163_CN-12-1163
Michael	Krikava	mkrikava@briggs.com	Briggs And Morgan, P.A.	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_12-1163_CN-12-1163

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Karen	Kromar	karen.kromar@state.mn.us	MN Pollution Control Agency	520 Lafayette Rd Saint Paul, MN 55155	Electronic Service	No	OFF_SL_12-1163_CN-12-1163
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_12-1163_CN-12-1163
James D.	Larson		Avant Energy Services	200 S 6th St Ste 300 Minneapolis, MN 55402	Paper Service	No	OFF_SL_12-1163_CN-12-1163
John	Lindell	agorud.ecf@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	OFF_SL_12-1163_CN-12-1163
Kim	Lindquist	kim.lindquist@ci.rosemount.mn.us		2875 145th St W Rosemount, MN 55068	Electronic Service	No	OFF_SL_12-1163_CN-12-1163
Susan	Ludwig	sludwig@mpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_12-1163_CN-12-1163
Kyle	MacLaury	N/A		212 3rd Ave N Ste 560 Minneapolis, MN 55401	Paper Service	No	OFF_SL_12-1163_CN-12-1163
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Paper Service	No	OFF_SL_12-1163_CN-12-1163
Brian	Mitchell	N/A	Corval Group	1633 Eustis St Saint Paul, MN 55108	Paper Service	No	OFF_SL_12-1163_CN-12-1163
Steven	Mittelstaedt	N/A		32097 Sandborn Dr Montgomery, MN 56069	Paper Service	No	OFF_SL_12-1163_CN-12-1163

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David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_12-1163_CN-12-1163
Andrew	Moratzka	apm@mcmlaw.com	Mackall, Crouse and Moore	1400 AT&T Tower 901 Marquette Ave Minneapolis, MN 55402	Electronic Service	No	OFF_SL_12-1163_CN-12-1163
Elling	Olson	N/A	M A Mortenson Co	700 Meadow Ln N Minneapolis, MN 55422	Paper Service	No	OFF_SL_12-1163_CN-12-1163
Carol A.	Overland	overland@legalectric.org	Legaelectric - Overland Law Office	1110 West Avenue Red Wing, MN 55066	Paper Service	No	OFF_SL_12-1163_CN-12-1163
Michael	Pangborn	N/A	NextEra Energy Resources	14000 Sundial Ct Eden Prairie, MN 55346	Paper Service	No	OFF_SL_12-1163_CN-12-1163
Bob	Patton	bob.patton@state.mn.us	MN Department of Agriculture	625 Robert St N Saint Paul, MN 55155-2538	Electronic Service	No	OFF_SL_12-1163_CN-12-1163
Angela	Piner	angela.piner@hdrinc.com	HDR, Inc.	Suite 600 701 Xenia Avenue South Suite 600 Minneapolis, MN 55416	Paper Service	No	OFF_SL_12-1163_CN-12-1163
Jay	Porter	jporter@GREnergy.com	Great River Energy	12300 Elm Creek Blvd Maple Grove, MN 55369	Paper Service	No	OFF_SL_12-1163_CN-12-1163
David	Richardson	N/A	AMEC	800 Marquette Ave Ste 1200 Midwest Plaza Bldg Minneapolis, MN 55420-2876	Paper Service	No	OFF_SL_12-1163_CN-12-1163
Christian	Rieck	N/A		2819 167th LN NW Andover, MN 55304	Paper Service	No	OFF_SL_12-1163_CN-12-1163

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Stoei	Riveslp	N/A		33 S 6th St Ste 4200 Minneapolis, MN 55402	Paper Service	No	OFF_SL_12-1163_CN-12-1163
Jennie	Ross	jennie.ross@state.mn.us		395 John Ireland Blvd MS 620 Saint Paul, MN 55155	Electronic Service	No	OFF_SL_12-1163_CN-12-1163
Dan L.	Sanford	N/A	American Transmission Company LLC	W234 N2000 Ridgeview Pkwyt Court Waukesha, WI 53188-1022	Paper Service	No	OFF_SL_12-1163_CN-12-1163
Thomas	Scharff	thomas.scharff@newpagecorp.com	New Page Corporation	P.O. Box 8050 610 High Street Wisconsin Rapids, WI 544958050	Electronic Service	No	OFF_SL_12-1163_CN-12-1163
Tod	Sherman	tod.sherman@dot.state.mn.us	Mn/DOT Metro District	Waters Edge 1500 West County Road B2 Roseville, MN 55113	Electronic Service	No	OFF_SL_12-1163_CN-12-1163
Glen	Skarbakka	N/A	Great River Energy	12300 Elm Creek Blvd Maple Grove, MN 55369	Paper Service	No	OFF_SL_12-1163_CN-12-1163
Glen	Skarbakka	glen.skarbakka@iberdrolaREN.com	Iberdrola Renewables	701 Fourth Avenue South, Suite 1010 Minneapolis, MN 55415	Paper Service	No	OFF_SL_12-1163_CN-12-1163
Dana	Slade	N/A	Avant Energy Services	200 S 6th St Ste 300 Minneapolis, MN 55402	Paper Service	No	OFF_SL_12-1163_CN-12-1163
Adam	Sokolski	adam.sokolski@iberdrolaren.com	Iberdrola Renewables	701 fourth Avenue South Suite 1010 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_12-1163_CN-12-1163

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ron	Spangler, Jr.	rlspangler@otpc.com	Otter Tail Power Company	215 So. Cascade St. PO Box 496 Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_12-1163_CN-12-1163
Tony	Sullins	N/A	U.S. Fish and Wildlife Service	Twin Cities Ecological Services Field Office 4101 American Blvd. E. Bloomington, MN 55425	Paper Service	No	OFF_SL_12-1163_CN-12-1163
Eric	Swanson	eswanson@winthrop.com	Winthrop Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_12-1163_CN-12-1163
Steven	Swenson	N/A	Pipestone Publishing	115 2nd St NE Pipestone, MN 56164	Paper Service	No	OFF_SL_12-1163_CN-12-1163
SaGonna	Thompson	Regulatory.Records@xcele nergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_12-1163_CN-12-1163
Karen	Turnboom	karen.turnboom@newpage corp.com	NewPage Corporation	100 Central Avenue Duluth, MN 55807	Electronic Service	No	OFF_SL_12-1163_CN-12-1163
Emily	Ulmer	N/A	Sierra Club	85 2nd St FL 2 San Francisco, CA 94105	Paper Service	No	OFF_SL_12-1163_CN-12-1163
Jeff	Vetsch	N/A	CERTs	112 Norwood St New London, MN 56273	Paper Service	No	OFF_SL_12-1163_CN-12-1163
James	Voller	N/A		33038 102nd Ave St Joseph, MN 56374	Paper Service	No	OFF_SL_12-1163_CN-12-1163
Laurance R.	Waldoch		Lindquist & Vennum	4200 IDS Center 80 South 8th Street Minneapolis, MN 554022274	Paper Service	No	OFF_SL_12-1163_CN-12-1163

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Guy	Wolf		Board Member of Clean Wisconsin	N3421 Mohawk Valley Road Stoddard, WI 54658	Paper Service	No	OFF_SL_12-1163_CN-12-1163

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Douglas	Benson	douglas.benson@state.mn.us	Department of Health	PO Box 64975 Saint Paul, MN 55155	Electronic Service	No	SPL_SL_CN - CERTIFICATE OF NEEDS
Randall	Doneen	randall.doneen@dnr.state.mn.us	Department of Natural Resources	500 Lafayette Road St. Paul, MN 55155	Electronic Service	No	SPL_SL_CN - CERTIFICATE OF NEEDS
Travis	Germundson	travis.germundson@state.mn.us		520 Lafayette Rd Saint Paul, MN 55155	Electronic Service	No	SPL_SL_CN - CERTIFICATE OF NEEDS
Karen	Kromar	karen.kromar@state.mn.us	MN Pollution Control Agency	520 Lafayette Rd Saint Paul, MN 55155	Electronic Service	No	SPL_SL_CN - CERTIFICATE OF NEEDS
Bob	Patton	bob.patton@state.mn.us	MN Department of Agriculture	625 Robert St N Saint Paul, MN 55155-2538	Electronic Service	No	SPL_SL_CN - CERTIFICATE OF NEEDS
Jennie	Ross	jennie.ross@state.mn.us		395 John Ireland Blvd MS 620 Saint Paul, MN 55155	Electronic Service	No	SPL_SL_CN - CERTIFICATE OF NEEDS