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November 20, 2012

VIA ELECTRONIC FILING

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

Re: Minnesota Power's Petition for Exemption from or
Confirmation of Certain Filing Requirements
Regarding the Great Northern Transmission Line
Docket No. E015/CN-12-1163

Dear Dr. Haar:

Minnesota Power hereby electronically submits its Petition for Exemption from or Confirmation of Certain Filing Requirements regarding the Great Northern Transmission Line.

Please contact me at the number above should you have any questions related to this submission.

Yours truly,

David R. Moeller

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Attachments
c: Service List



**STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION**

In the Matter of the Request by Minnesota
Power for a Certificate of Need for the
Great Northern Transmission Line

Docket No. E015/CN-12-1163

**PETITION FOR EXEMPTION FROM
OR CONFIRMATION OF CERTAIN
FILING REQUIREMENTS**

SUMMARY OF FILING

Minnesota Power, on behalf of potentially several other participants, intends to file an application for a Certificate of Need (“CoN”) for the Great Northern Transmission Line in early 2013. This Petition seeks clarification on which of the Minnesota Public Utilities Commission’s (“Commission”) Certificate of Need filing requirements are appropriate to determining the need for the Great Northern Transmission Line and requests that the Commission approve Minnesota Power’s proposal to provide alternate data for certain content requirements in its CoN application. A Certificate of Need is required by Minn. Stat. § 216B.243, subd. 2.

**STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION**

In the Matter of the Request by Minnesota
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Docket No. E015/CN-12-1163

**PETITION FOR EXEMPTION FROM
OR CONFIRMATION OF CERTAIN
FILING REQUIREMENTS**

I. Introduction

Minnesota Power, on behalf of several other potential participants, intends to file a request for a Certificate of Need (“CoN”) for the Great Northern Transmission Line (“Project”) in early 2013. A Certificate of Need is required by Minn. Stat. § 216B.243, subd. 2. The Project is comprised of three parts: 1) a 500 kV transmission line from the Manitoba/Minnesota border that would terminate at the Blackberry Substation in Itasca County (approximately 250 to 300 miles); 2) a 345 kV transmission line between the Blackberry Substation and the Arrowhead Substation near Hermantown (approximately 50 to 70 miles); and 3) associated facilities near the two substations.

This Petition seeks clarification on which of the Minnesota Public Utilities Commission’s (“Commission”) CoN filing requirements are appropriate in determining the need for the Project and requesting that for purposes of the CoN, the Commission acknowledge that Minnesota Power is the “applicant” and is making application on behalf of itself and anticipated co-owners of the Project.

The Commission’s rules, Minn. Rules Ch. 7849, establish the Certificate of Need filing requirements for both a high voltage transmission line (“HVTL”) and a large electric generation facility (“LEGF”). Those filing requirements were broadly drafted to encompass all types of

large energy facilities. This Petition requests confirmation that certain portions of the filing requirements are not intended to apply to a transmission facility like the Project. In addition, Minn. Rules 7849.0200, subp. 6, authorizes applicants to seek an exemption from filing requirements that are unnecessary to determine need or if the filing requirement will be satisfied by a different document, stating in part:

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.

This Petition seeks an exemption from those portions of the filing requirements that are unnecessary to determine the need for the Project or where the data requirement may be satisfied by submitting other information. As cited in this Petition, the Commission has reviewed similar requests and exempted applicants for transmission projects from meeting certain of the content requirements in the Commission's rules:

- *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 dated July 2, 2002 (“Plymouth-Maple Grove Exemption Order”);
- *In the Matter of the Request by Great River Energy for a Certificate of Need for a High Voltage Transmission Line from the Mud Lake Substation to the Wilson Lake Substation*, Docket No. ET-2/CN-06-367, Order dated May 15, 2006 (“Wilson Lake Exemption Order”);
- *In the Matter of the Otter Tail Power Company Application for a Certificate of Need for a 115 Kilovolt Transmission Line Between Appleton and Canby*

Substations, Docket No. E017/CN-06-677, Order dated August 1, 2006 (“Appleton-Canby Exemption Order”);

- *In the Matter of the Application of Northern States Power d/b/a/ Xcel Energy, Great River Energy and Others for Certificates of Need for Three 345 kV Transmission Lines*, Docket No. ET-2, E002/CN-06-1115, Order dated June 4, 2007 (“345 kV Projects Exemption Order”);
- *In the Matter of the Application of Otter Tail Power Company, Minnesota Power and Minnkota Power Cooperative, Inc. for a 230 kV Transmission Line from Bemidji to Grand Rapids, Minnesota*, Docket No. E-017, E-015, ET-6/CN-07-1222, Order dated December 24, 2007 (“Bemidji-Grand Rapids Exemption Order”); and
- *In the Matter of the Application of Great River Energy and Minnesota Power for a Certificate of Need for a 115 kV High Voltage Transmission Line in St. Louis and Carlton Counties*, Docket No. ET2, E015/CN-10-973, Order dated November 2, 2010 (“Savanna Order”).

II. Line Loss Information Under Minn. Rules 7849.0260, subs. A(3) and C(6).

These rule provisions require CoN applicants to calculate “the expected [or estimated] losses under projected maximum loading and under projected average loading in the length of the transmission line and at the terminals or substations.” An exemption from this requirement is requested because the amount of electricity lost through transmission should be calculated on the basis of the transmission network as a whole. The Commission has recognized in other dockets the value of analyzing line losses on a system basis rather than a single line. *See* 345 kV Projects Exemption Order at 8; Bemidji-Grand Rapids Exemption Order at 4 (Department of Commerce

(“DOC”) Comments). Minnesota Power proposes providing system energy loss analyses for the Project and other transmission options considered.

III. Forecasting Information Under Minn. Rules 7849.0270

A. System-wide data – Minn. Rules 7849.0270, subps. 1 and 2

Minn. Rules 7849.0270, subps. 1 and 2 require extensive information concerning peak demand, annual consumption, weekday load factors, and forecasts for the Project for the Applicants’ entire service area and system. The Project is not proposed to address peak demand or system capacity issues. Instead, the Project is proposed to provide generator transfer capabilities for Manitoba Hydro generation resources. Resource plans before the Commission and regional planning studies¹ 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 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.

In light of the circumstances described above, Minnesota Power proposes to provide information on the transfer capability requirements that are necessary to allow importation of reliable baseload generation from Manitoba Hydro. Further, Minnesota Power will provide information 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

¹ Minnesota Power will separately address the Department’s November 19, 2012 Comments on the Notice Plan related to the MISO studies noted therein.

available. Minnesota Power will also provide information 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.

B. Customer Class Information – Minn. Rules 7849.0270, subps. 2(B) and 2(C)

Minnesota Power requests it be granted an exemption from the rule requirement that an applicant estimate system consumption by customer class for each of the forecast years. Providing such 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. The Commission has granted this exemption on the grounds that the marginal benefit of the data does not justify the substantial effort spent gathering it. *See* Bemidji-Grand Rapids Exemption Order at 5 (DOC Comments); 345 kV Projects Exemption Order at 11; Appleton-Canby Exemption Order at 5; Savanna Order at 3 (DOC Comments).

C. System Revenue Requirements - Minn. Rules 7849.0270, subp. 2(E)

Minnesota Power requests that it be exempt from the system revenue requirements provision, which requires an estimate of the annual revenue requirement per kilowatt-hour for each utility's system as a result of the Project. Final ownership splits between Minnesota Power 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 these 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. Instead Minnesota Power proposes

providing an explanation of how MISO, the independent transmission service provider and wholesale market administrator in the region, allocates transmission costs among users of the transmission grid on a participant funded basis, and the general financial effect of the Project on the ratepayers of Minnesota Power. The Commission has recently granted similar exemptions for transmission projects. *See* Bemidji-Grand Rapids Exemption Order at 6 (DOC Comments); 345 kV Projects Exemption Order at 14; Savanna Order at 3-4 (DOC Comments).

D. Weekday Load Factor – Minn. Rules 7849.0270, subp. 2(F)

Minn. Rules 7849.0270, subp. 2(F) requests the applicant’s average system weekday load factor for each month. Minnesota Power requests an exemption from this requirement because load factor is not a relevant measure when evaluating the need for a transmission facility. *See* Wilson Lake Exemption Order at 8; 345 kV Projects Exemption Order at 13.

IV. System Capacity Information Under Minn. Rules 7849.0280.

Minn. Rules 7849.0280 addresses system capacity issues. Limited portions of the Rules have meaningful application to the Project. More specifically, Minnesota Power seeks confirmation that the filing requirements contained in Minn. Rules 7849.0280 that are applicable to a HVTL should be satisfied by providing information that relates back to Minn. Rules 7849.0270.

The lead paragraph of the Rule provides:

The applicant shall describe the ability of its existing system to meet the demand for electrical energy forecast in response to part 7849.0270 and the extent to which the proposed facility will increase this capability. In preparing this description, the applicant shall present the following information:

(Emphasis added.)

The above-quoted portion of the rule requires that the “following information” be provided with respect to the energy forecast provided in response to Minn. Rules 7849.0270.

However, with the exception of paragraphs A and H, all of the requested additional information relates to generation capacity and need, which is irrelevant to the need for a HVTL. Therefore, an exemption pursuant to Minn. Rules 7849.0200, subp. 6, from the filing requirements of paragraphs B through G and I is requested – “the data requirement is unnecessary to determine the need for the proposed facility. ...”

In response to earlier identical requests by a cooperative, the Commission granted exemptions from filing the information required by Minn. Rules 7849.0280, paragraphs B through G and I. *See* Plymouth-Maple Grove Exemption Order at 5; Wilson Lake Exemption Order at 7; *see also*, Appleton-Canby Exemption Order at 3-5. In the Plymouth-Maple Grove Exemption Order, the Commission further determined that item A, requiring data on the applicant’s planning process and programs, is relevant to the extent that those processes and programs deal with transmission capability and planning. By granting an exemption from the requirements of paragraphs B through G and I, and applying the remaining requirements of the Rule, the information relevant to determining the need for the proposed facility will be provided. *See also*, Appleton-Canby Exemption Order at 3-5.

V. Conservation and Efficiency Information Under Minn. Rules 7849.0290

The information required under Minn. Rules 7849.0290 relates to conservation programs the applicant has in place and their effect on the forecast information called for in 7849.0270. In the context of a project such as the Great Northern Transmission Line that is intended to address multiple needs, including providing a connection to a generation source, it is difficult to meet this content requirement for reasons similar to why Minnesota Power has proposed alternate data to address the forecasting content requirements. This Project will serve customers throughout the state and region. The forecast used by Minnesota Power accounts for conservation 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.

VI. Consequences of Delay and No Facility Alternative Under Minn. Rules 7849.0300 and 7849.0340

Minn. Rules 7849.0300 requires a discussion of consequences of delay of a proposed project. This discussion is an important element of a determination of need for new transmission infrastructure. Minnesota Power fully intends to discuss issues related to delay of the facility. The Rule, however, requires that the examination of delay incorporate three specific statistically based levels of demand. Additionally, Minn. Rules 7849.0340 asks for a discussion of the “no facility” alternative and examination using the same three levels of demand. 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.

VII. The Applicant

Consistent with the Commission's determination in the 345 kV Projects Exemption Order, Minnesota Power requests Commission approval to be the applicant for purposes of the CoN application. Minn. Stat. § 216B.243 does not define or give any guidance with regard to who must be an applicant for a CoN, but simply applies to "any person". *See* Minn. Stat. § 216B.243, subd. 4. Minnesota Power meets this statutory threshold as public utility requesting to construct the Great Northern Transmission Line on behalf of itself and others.

Likewise, Minn. Rules Ch. 7849 does not define or provide guidance concerning who should be the applicant either. As the Commission noted in the 345 kV Projects Exemption Order, the "statutes and rules focus more attention on the importance of demonstrating need than on identity of the demonstrator." Order at 4. The rules do contemplate a process for adjusting ownership of a transmission line for which a CoN has been granted. *See* Minn. Rules 7849.0400, subp. 2.H ("If an applicant determines that a change in size, type, timing, or ownership other than specified in this subpart is necessary...the applicant must inform the Commission of the desired change and detail the reasons for the change."). Therefore, Minnesota Power respectfully requests authorization to have Minnesota Power as the applicant.

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.

VIII. General Filing Information

Pursuant to Minn. Stat. § 216B.243 and Minn. Rules 7829.1300, the Applicants provide the following required general filing information.

A. Summary of Filing (Minn. Rules 7829.1300, subp.1)

A one-paragraph summary accompanies this Petition.

B. Service on Other Parties (Minn. Rules 7829.1300, subp. 2)

Pursuant to Minn. Stat. § 216.17, subd. 3 and Minn. Rules 7829.1300, subp. 2, Minnesota Powers eFiles the Petition on the Department of Commerce. A summary of the filing prepared in accordance with Minn. Rules 7829.1300, subp. 1 is being served on the Minnesota Power's general service list and the Commission's general service list of persons interested in power plants and transmission lines.

C. Name, Address and Telephone Number of Utility (Minn. Rules 7829.1300, subp. 4(A))

Minnesota Power
30 West Superior Street
Duluth, MN 55802
(218) 722-2641

D. Name, Address and Telephone Number of Utility Attorney (Minn. Rules 7829.1300, subp. 4(B))

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E. Date of Filing and Date Proposed Rate Takes Effect (Minn. Rules 7829.1300, subp. 4(C))

This Petition is being filed on November 20, 2012.

F. Statute Controlling Schedule for Processing the Filing (Minn. Rules 7829.1300, subp. 4(D))

This Petition is made pursuant to Minn. Rules 7849.0200, subp. 6. Minn. Rules 7849.0200, subp. 6 requires that a request for an exemption be submitted at least 45 days prior to the submittal of a Certificate of Need application. This rule also provides for a written response from the Commission within 30 days of receipt of the exemption request.

G. Utility Employee Responsible for Filing (Minn. Rules 7829.1300, subp. 4(E))

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H. Impact on Rates and Services (Minn. Rules 7829.1300, subp. 4(F))

This Petition will have no effect on Minnesota Power's base rates.

I. Service List (Minn. Rules 7829.0700)

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IX. Conclusion

Minnesota Power respectfully requests that the Commission provide the requested clarifications and exemptions, allowing Minnesota Power to provide the information reasonably needed to make a need determination for the Project without imposing unnecessary filing burdens.

Dated: November 20, 2012

Respectfully submitted,

A handwritten signature in black ink that reads "David R. Moeller". The signature is written in a cursive, flowing style.

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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
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
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
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
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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
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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
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