



Mara N. Koeller
Associate Attorney

414 Nicollet Mall, 5th Floor
Minneapolis, Minnesota 55401
Phone: 612.215.4605
Fax: 612.215.4544

February 19, 2014

VIA ELECTRONIC FILING AND U.S. MAIL

Dr. Burl W. Haar
Executive Secretary
Minnesota Public Utilities Commission
350 Metro Square Building, Suite 350
St. Paul, MN 55101

Re: *In the Matter of the Route Permit Application for the Hollydale 115 kV Transmission Line Project in the Cities of Plymouth and Medina, Hennepin County, Minnesota*
PUC Docket No. E002/TL-11-152
OAH Docket No. 8-2500-22806-2

In the Matter of the Application for a Certificate of Need for the Hollydale 115 kV Transmission Line Project in the Cities of Plymouth and Medina
MPUC Docket No. E002, ET2/CN-12-113
OAH Docket No.: 8-2500-23147-2

Dear Dr. Haar:

Enclosed please find Northern States Power Company, doing business as Xcel Energy, and Great River Energy's Reply Comments on Withdrawal of Certificate of Need and Route Permit Applications for the Hollydale Project filed today in the above-referenced dockets through www.edockets.state.mn.us. A copy of this filing is also being served via e-mail or mail upon the persons on the Official Service Lists. Thank you.

Sincerely,

A handwritten signature in black ink that reads 'Mara Koeller'.

Mara N. Koeller

cc: Service Lists

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger	Chair
David Boyd	Commissioner
Nancy Lange	Commissioner
Dan Lipschultz	Commissioner
Betsy Wergin	Commissioner

IN THE MATTER OF THE APPLICATION
OF NORTHERN STATES POWER
COMPANY, A MINNESOTA
CORPORATION, AND GREAT RIVER
ENERGY, A NOT-FOR-PROFIT
COOPERATIVE, FOR A ROUTE PERMIT
FOR THE HOLLYDALE 115 kV
TRANSMISSION LINE PROJECT IN THE
CITIES OF PLYMOUTH AND MEDINA,
HENNEPIN COUNTY, MINNESOTA

Docket No. E002/TL-11-152
Docket No. E002, ET2/CN-12-113
OAH Docket No. 8-2500-23147-2

**XCEL ENERGY AND GREAT RIVER
ENERGY'S REPLY COMMENTS ON
WITHDRAWAL OF CERTIFICATE OF NEED
AND ROUTE PERMIT APPLICATIONS FOR
HOLLYDALE PROJECT**

IN THE MATTER OF THE APPLICATION
FOR A CERTIFICATE OF NEED FOR THE
HOLLYDALE 115 kV TRANSMISSION
LINE PROJECT IN THE CITIES OF
PLYMOUTH AND MEDINA

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, on behalf of itself and its co-applicant Great River Energy, a cooperative corporation, respectfully submit these reply comments to the initial comments filed by: (1) the Department of Commerce-Division of Energy Resources (Department); (2) Western Plymouth Neighborhood Alliance (WPNA); (3) the Barry Family; and (4) concerned residents regarding our petition to withdraw our pending applications for the Hollydale Project.

DISCUSSION

A. Preservation of Current Hearing Record

As evidenced by the hundreds of comments filed to date, the Hollydale Project continues to prompt active participation from parties and concerned residents. The comments from the Department, intervenors, and concerned residents demonstrate that there is consensus on several key matters related to our request to withdraw our pending certificate of need and route permit applications for the Hollydale Project. First, all commentators agree that it is important to preserve the extensive hearing record that has been developed during these lengthy proceedings. And, all agree that the appropriate method to preserve this record is for the Commission to request that the Office of Administrative Hearings (OAH) prepare a summary of the comments and testimony developed during the public hearing process in these proceedings.

B. Conditions on Withdrawal

There is also consensus among the parties and concerned residents that the Commission should allow withdrawal of the pending applications for the Hollydale Project. There is, however, disagreement as to whether the Commission should impose conditions on this withdrawal. We agree with the recommendations of the Department and the Administrative Law Judge that conditions should not be imposed. Intervenors and concerned residents have requested that the Commission impose the following three conditions:

- (1) prohibit Xcel Energy and Great River Energy from resubmitting a variation of the Hollydale 115 kV transmission project, a rebuild project or an upgrade project along the existing 69 kV corridor;
- (2) require use of the full certificate of need process, applying the “clear and convincing” standard from the Hollydale law, before building transmission in Plymouth or Medina; and
- (3) require compliance filings to show that distribution improvements are being promptly made to meet distribution needs in the area.

The first condition prohibits resubmittal of any new transmission proposal that utilizes the existing 69 kV transmission line corridor in Medina and Plymouth. The second suggested condition requires any future transmission proposal in this area to

be subject to both the full certificate of need process and to the requirements imposed by the Hollydale law.¹

We intend to work with the community and stakeholders on developing a more widely supported electrical solution to meet the needs of this area and we do not want to prejudge the outcome of these public outreach efforts by removing route alternatives from consideration. We have also agreed to carry forward the numerous distribution alternatives developed in this proceeding in any future certificate of need application. We therefore believe conditions one and two are not appropriate.

As for the third condition, intervenors and concerned residents request that the Commission require compliance filings showing that distribution improvements are being made in the area. We are committed to providing safe and adequate electric service to our customers in Plymouth and Medina. To that end, Xcel Energy intends to submit an informational filing on November 14, 2014 which will update the Commission on public outreach efforts, provide Xcel Energy's summer peak information, and detail any distribution improvements that are made by Xcel Energy in the area.² This filing will be made in addition to the annual safety, reliability, and service quality report that Xcel Energy provides to the Commission each year. This annual report includes information related to the reliability performance of Xcel Energy's distribution system compared to established metrics.³ Xcel Energy and Great River Energy believe that these filings will allow the Commission sufficient information to evaluate distribution reliability in this area.

CONCLUSION

Xcel Energy and Great River Energy respectfully request that the Commission grant their request to withdraw their pending applications for the Hollydale Project without conditions and request that the OAH prepare a summary of public hearing record.

¹ 2013 Minn. Laws, Ch. 57, Sec. 2.

² Note that Great River Energy's distribution information will not be included because the distribution improvements being made by the proposed project only serve Xcel Energy's distribution system needs. Great River Energy's participation in the proposed project is only at the transmission system level.

³ See MPUC Docket No. E002/M-13-255.

Dated: February 19, 2014

Northern States Power Company

Respectfully submitted by:

/s/ Mara Koeller

MARA KOELLER

ASSOCIATE ATTORNEY

IN THE MATTER OF THE ROUTE PERMIT
APPLICATION FOR THE HOLLYDALE 115 kV
TRANSMISSION LINE PROJECT IN THE CITIES OF
PLYMOUTH AND MEDINA, HENNEPIN COUNTY,
MINNESOTA

PUC DOCKET No. E002/TL-11-152
OAH DOCKET No. 8-2500-22806-2

IN THE MATTER OF THE APPLICATION FOR A
CERTIFICATE OF NEED FOR THE HOLLYDALE
115 kV TRANSMISSION LINE PROJECT IN THE
CITIES OF PLYMOUTH AND MEDINA

PUC DOCKET No. E002, ET2/CN-12-113
OAH DOCKET No.: 8-2500-23147-2

Theresa A. Senart hereby certifies that on the 19th day of February, 2014, she filed a true and correct copy of Northern States Power Company and Great River Energy's Reply Comments on Withdrawal of Certificate of Need and Route Permit Applications for Hollydale Project by posting the same on www.edockets.state.mn.us in the above-referenced dockets. Said Reply Comments is also served via U.S. Mail or e-mail as designated on the attached Official Service Lists on file with the Minnesota Public Utilities Commission in the above-referenced dockets.

s/Theresa A. Senart
Theresa Senart

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Lisa	Agrimonti	lagrimonti@briggs.com	Briggs And Morgan, P.A.	2200 IDS Center 80 South 8th Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_11-152_Official CC Service List
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_11-152_Official CC Service List
RaeLynn	Asah	raelynn.asah@xcelenergy.com	Xcel Energy Services, Inc.	Transmission FL 8 250 Marquette Ave Minneapolis, MN 55402	Electronic Service	No	OFF_SL_11-152_Official CC Service List
Tami	Carpenter	tamicarp@comcast.net		16925 40th Ave N Plymouth, MN 55446	Electronic Service	No	OFF_SL_11-152_Official CC Service List
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 500 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_11-152_Official CC Service List
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_11-152_Official CC Service List
Valerie	Herring	vherring@briggs.com	Briggs and Morgan, P.A.	2200 IDS Center 80 S. Eighth Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_11-152_Official CC Service List
Scott	Johnson	Scott.Johnson@ci.medina.mn.us	City of Medina	2052 County Road 24 Medina, MN 55340-9790	Electronic Service	No	OFF_SL_11-152_Official CC Service List
Stacy	Kotch	Stacy.Kotch@state.mn.us	MINNESOTA DEPARTMENT OF TRANSPORTATION	395 John Ireland Blvd. St. Paul, MN 55155	Electronic Service	No	OFF_SL_11-152_Official CC Service List
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_11-152_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Eric	Lipman	eric.lipman@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 551640620	Paper Service	Yes	OFF_SL_11-152_Official CC Service List
Paula	Maccabee	Pmaccabee@justchangela w.com	Just Change Law Offices	1961 Selby Avenue St. Paul, MN 55104	Electronic Service	No	OFF_SL_11-152_Official CC Service List
Marsha	Parlow	mparlow@greenergy.com	Great River Energy	12300 Elm Creek Boulevard Maple Grove, MN 553694718	Electronic Service	No	OFF_SL_11-152_Official CC Service List
Daniel N.	Rosen	rosen@parkerrosen.com	Parker Rosen, LLC	300 First Ave N, Ste 200 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_11-152_Official CC Service List
Janet	Shaddix Elling	jshaddix@janetshaddix.co m	Shaddix And Associates	Ste 122 9100 W Bloomington Frwy Bloomington, MN 55431	Electronic Service	No	OFF_SL_11-152_Official CC Service List
James M.	Strommen	jstrommen@kennedy- graven.com	Kennedy & Graven, Chartered	470 U.S. Bank Plaza 200 South Sixth Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_11-152_Official CC Service List
SaGonna	Thompson	Regulatory.Records@xcele nergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_11-152_Official CC Service List
Karen	Wendt	wendt@parkerrosen.com	Parker Rosen	123 Third St N Ste 888 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_11-152_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_12-113_Official CC Service List
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	No	OFF_SL_12-113_Official CC Service List
James J.	Bertrand	james.bertrand@leonard.com	Leonard Street & Deinard	150 South Fifth Street, Suite 2300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_12-113_Official CC Service List
Brenda A.	Bjorklund	brenda.bjorklund@centerpointenergy.com	CenterPoint Energy	800 LaSalle Ave FL 14 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_12-113_Official CC Service List
Michael	Bradley	mike.bradley@lawmoss.com	Moss & Barnett	Suite 4800 90 S 7th St Minneapolis, MN 55402-4129	Electronic Service	No	OFF_SL_12-113_Official CC Service List
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 500 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_12-113_Official CC Service List
Jeffrey A.	Daugherty	jeffrey.daugherty@centerpointenergy.com	CenterPoint Energy	800 LaSalle Ave Minneapolis, MN 55402	Electronic Service	No	OFF_SL_12-113_Official CC Service List
Ian	Dobson	ian.dobson@ag.state.mn.us	Office of the Attorney General-RUD	Antitrust and Utilities Division 445 Minnesota Street, BRM Tower St. Paul, MN 55101	Electronic Service	No	OFF_SL_12-113_Official CC Service List
Chris	Duffrin	chrisd@thenec.org	Neighborhood Energy Connection	624 Selby Avenue St. Paul, MN 55104	Electronic Service	No	OFF_SL_12-113_Official CC Service List
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 500 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_12-113_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Travis	Germundson	travis.germundson@state.mn.us		Board of Water & Soil Resources 520 Lafayette Rd Saint Paul, MN 55155	Electronic Service	No	OFF_SL_12-113_Official CC Service List
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_12-113_Official CC Service List
Valerie	Herring	vherring@briggs.com	Briggs and Morgan, P.A.	2200 IDS Center 80 S. Eighth Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_12-113_Official CC Service List
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2265 Roswell Road Suite 100 Marietta, GA 30062	Electronic Service	No	OFF_SL_12-113_Official CC Service List
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	90 South 7th Street Suite #4800 Minneapolis, MN 554024129	Electronic Service	No	OFF_SL_12-113_Official CC Service List
Scott	Johnson	Scott.Johnson@ci.medina.mn.us	City of Medina	2052 County Road 24 Medina, MN 55340-9790	Electronic Service	No	OFF_SL_12-113_Official CC Service List
Mara	Koeller	mara.n.koeller@xcelenergy.com	Xcel Energy	414 Nicollet Mall 5th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_12-113_Official CC Service List
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_12-113_Official CC Service List
Karen	Kromar	karen.kromar@state.mn.us	MN Pollution Control Agency	520 Lafayette Rd Saint Paul, MN 55155	Electronic Service	No	OFF_SL_12-113_Official CC Service List
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_12-113_Official CC Service List

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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	No	OFF_SL_12-113_Official CC Service List
Eric	Lipman	eric.lipman@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 551640620	Paper Service	Yes	OFF_SL_12-113_Official CC Service List
Paula	Maccabee	Pmaccabee@justchangela w.com	Just Change Law Offices	1961 Selby Avenue St. Paul, MN 55104	Electronic Service	No	OFF_SL_12-113_Official CC Service List
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_12-113_Official CC Service List
David W.	Niles	david.niles@avantenergy.c om	Minnesota Municipal Power Agency	Suite 300 200 South Sixth Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_12-113_Official CC Service List
Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	OFF_SL_12-113_Official CC Service List
Marsha	Parlow	mparlow@grenergy.com	Great River Energy	12300 Elm Creek Boulevard Maple Grove, MN 553694718	Electronic Service	No	OFF_SL_12-113_Official CC Service List
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_12-113_Official CC Service List
Richard	Savelkoul	rsavelkoul@martinsquires.c om	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_12-113_Official CC Service List
Janet	Shaddix Elling	jshaddix@janetshaddix.co m	Shaddix And Associates	Ste 122 9100 W Bloomington Frwy Bloomington, MN 55431	Electronic Service	Yes	OFF_SL_12-113_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	OFF_SL_12-113_Official CC Service List
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_12-113_Official CC Service List
Donna	Stephenson	dstephenson@greenergy.com	Great River Energy	12300 Elm Creek Boulevard Maple Grove, MN 55369	Electronic Service	No	OFF_SL_12-113_Official CC Service List
James M.	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	470 U.S. Bank Plaza 200 South Sixth Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_12-113_Official CC Service List
Eric	Swanson	eswanson@winthrop.com	Winthrop Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_12-113_Official CC Service List
SaGonna	Thompson	Regulatory.Records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_12-113_Official CC Service List