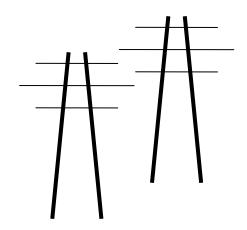
Legalectric, Inc.

Carol Overland Attorney at Law, MN #254617 Energy Consultant—Transmission, Power Plants, Nuclear Waste

overland@legalectric.org

1110 West Avenue Red Wing, Minnesota 55066 612.227.8638



October 15, 2015

Judge James Mortensen Office of Administrative Hearings P. O. Box 64620 St. Paul, MN 55164-0620

RE: Andersen Motion for Reconsideration

In the Matter of the Application of Great River Energy and Minnesota Power for a Certificate of Need and Route Permit for the Menahga Area 115 kV Transmission Project in Hubbard, Wadena and Becker Counties, Minnesota

OAH Docket: 5-2500-32715

Munland

PUC Docket: ET-2, E-015/CN-14-787 (Certificate of Need) PUC Docket: ET-2, E-015/TL-14-797 (Route Permit)

Dear Judge Mortenson:

Enclosed, and filed on eDockets and eServed, please find a hard copy of Andersen's Motion for Reconsideration.

Thank you for your attention to these matters. If you have any questions, or require further information, please let me know.

Very truly yours,

Carol A. Overland Attorney at Law

cc: eFiled and eServed

CERTIFICATE OF SERVICE

RE: In the Matter of the Application of Great River Energy and Minnesota Power for a Certificate of Need and Route Permit for the Menahga Area 115 kV Transmission Project in Hubbard, Wadena and Becker Counties, Minnesota

OAH Docket: 5-2500-32715

PUC Docket: ET-2, E-015/CN-14-787 (Certificate of Need)

PUC Docket: ET-2, E-015/TL-14-797 (Route Permit)

I, Carol A. Overland, hereby certify that I have this day, served copies of the attached Andersen's Motion for Reconsideration by electronic filing eService and U.S. Mail.

Dated: September 15, 2015

Carol A. Overland

#254617

Attorney for Donna J. Andersen, Curtis Andersen, and Donna J. Andersen Trust

LEGALECTRIC

OVERLAND LAW OFFICE

Carl Horrland

1110 West Avenue

Red Wing, MN 55066

(612) 227-8638

STATE OF MINNESOTA OFFICE OF ADMINISTRATIVE HEARINGS

FOR THE PUBLIC UTILITIES COMMISSION

In the Matter of the Application of Great River Energy and Minnesota Power for a Certificate of Need and Route Permit for the Menahga Area 115 kV Transmission Project in Hubbard, Wadena and Becker Counties, Minnesota PUC Docket No. ET-2,E-015/CN-14-787 PUC Docket No. ET-2,E-015/TL-14-797

OAH Docket No. 5-2500-32715

MOTION FOR RECONSIDERATION

Donna J. Andersen and Curtis Andersen, and the Donna J. Andersen Trust, Donna J. Andersen, Trustee (hereinafter "Andersen"), landowners on the route proposed for the Menahga Area 115 kV transmission Line Project (hereinafter "Menahga Project"), hereby submit this Motion for Reconsideration of their Petition for Full Process and Contested Case and Intervention, denied on October 14, 2015. These requests by Andersen were framed as a "Petition" because it is a request for action, and because Andersen is not currently an Intervenor, the court correctly notes that Andersen has no standing to file a Motion for Full Process and Contested Case and Intervention.

The order of the Order is backwards, taking the cart before the horse. The Order first denied the Petition to Intervene and "therefore" denied the Petition/Motion for Full Process and Referral for Contested Case and Additional Public Hearings. In the truncated Certificate of Need process under Minn. R. 7849.1200, and in Alternate Review for non-contested routing dockets, Minn. Stat. §216E.04, there is no opportunity for intervention. Intervention is participation as a party in a contested case. Thus, the Petition for a Contested Case must be addressed first, and

-

¹ Andersen and counsel note that neither were served with the October 14, 2015 Order.

then, if granted, the Petition for Intervention considered.

Andersen requests that the Order of October 14, 2015 be reconsidered, and that in the alternative, this request and the Petition for Full Process and Contested Case and Intervention be Certified to the Commission for consideration.

I. INTERVENTION

As noted in the order, "A person seeking to intervene in a hearing as a party must file "a timely petition to intervene." Order Memorandum, p. 2. There has been no intervention deadline established in these dockets by either the ALJ or the Commission. While unusual, that is the case in this docket.

At no time was Andersen informed that intervention was an available option. None of the notices received disclose intervention as an option, nor was Andersen informed of this option in communications with Commission and Commerce staff.

Where there is no contested case, there is no opportunity for Intervention. While there is under the rules opportunity to question witnesses at the Public Hearing, that has through history been unreasonably limited and even denied. Where there is Alternate Review with only a "Summary Report" there is no opportunity for Briefing or Exceptions. Where there is no Environmental Impact Statement, there is no opportunity to Comment on the draft EIS or the adequacy of the final EIS. Andersen's Petition for Intervention is secondary to the Petition for Contested Case, and is a request to participate as a party in broadened proceedings.

II. <u>CONTESTED CASE PROCEEDINGS</u>

Although the order states that "[t]here is no such legal procedure as a 'petition' to convert a public hearing to a contested case hearing," that was not requested -- the Petition specifically requested to convert the fast-track process of Minn. R. 7829.1200 and Routing

Alternative Review of Minn. Stat. §216E.04 to a full-process. And conversely, there is indeed such a legal procedure, and it has been utilized in the past by the public and by a utility applicant. That potential for increased process was both considered by the Commission in ordering the fast-track process in this case, and has indeed been requested and ordered by the Commission in past cases.

In its Order in this docket, the Commission acknowledged that there may be a need for contested case:

At this time there are no contested material facts, future factual disputes appear unlikely, and there are no other factors pointing to a need for contested case proceedings. The Commission will therefore authorize staff to develop the record and prepare this case for Commission action without contested case proceedings under Minn. Stat. §§14.57 *et seq.*, **unless those proceedings are later determined to be necessary.** Accordingly, the Commission will direct the use of the informal review process under Minn. R. 7829.1200 to develop the record for the certificate of need.

Order, March 18, 2015 (emphasis added). The Petition filed by Andersen is a request for an Order that "those proceedings are … determined to be necessary," and provided a number of reasons demonstrating that a contested case is necessary.

Minnesota statutes and case law are very clear on the importance of public participation, and in fact, a section of the Power Plant Siting Act is entitled exactly that and mandates open process:

216E.08 PUBLIC PARTICIPATION.

Subd. 2. Other public participation.

The commission shall adopt broad spectrum citizen participation as a principal of operation. The form of public participation shall not be limited to public hearings and advisory task forces and shall be consistent with the commission's rules and guidelines as provided for in section 216E.16.

Minn. Stat. 216E.08, Subd. 2.

In the past, the Commission has fast-tracked other transmission projects, and upon request, slowed the process down and opened it up to additional public participation, intervention, and agency

scrutiny. For example, the Chisago Transmission Project III was one such proceeding where this writer, on behalf of the City of Lindstrom, requested a Contested Case in a fast-tracked proceeding.² The Commission ordered a hybrid process to afford additional opportunities for public and intervenor participation.³

Another example may be found in the Hollydale transmission case, where, again, a proceeding was fast-tracked, and Plymouth Residents, a neighborhood association, requested conversion from Alternate Review to a full process review.⁴ In that docket, 20 days later, the Applicant, Xcel Energy, filed a Petition to Convert Route Permit Proceeding from an Alternative Permitting Process to a Full Permitting Process with the Commission.⁵ Subsequently, in this case the Commission also ordered increased process to facilitate public participation.⁶

The Commission has a history of recognizing that increased process is necessary, and in

2			=						
4015030	PUBLIC	06-1677		CN	CITY OF LINDSTROM		1	OTHERPETITION FOR CONTESTED CASE	
3									
4046664	PUBLIC	06-1677			TL	PUC		ORDER	05/02/2007
4									,
20122- 71234-01	PUBLIC	11-152		TL		MOUTH HOLLYI PROJEC		NOPPOSING DALE POWERLINE T-PETITION AND N FOR FULL ROUTING SS	02/06/2012
5									
<u>20122-</u> <u>71931-01</u>	PUBLIC	11-152		TL	POWER MINNE CORPO GREAT ENERG	THERN STATES ER COMPANY, A NESOTA PORATION AND AT RIVER RGY, A NOT-FOR- FIT COOPERATIVE		OTHERPETITION TO CONVERT ROUTE PERMIT PROCEEDING FROM AN ALTERNATIVE PERMITTING PROCESS TO A FULL PERMITTING PROCESS	02/27/2012
6									
20125- 74462-01	PUBLIC	11-152		TL	PUC H	ORDERNOTICE AND ORDER FOR HEARING UNDER MINNESOTA RULES CHAPTER 1405			05/04/2012

this case, recognized in its Order that possibility. There is established precedent in Commission proceedings for Petitions for a Contested Case, utilized by both the public and by an Applicant, and there is established precedent of Commission Orders to expand process to facilitate participation. The only way to convert an abbreviated process, such as the CoN "informal and expedited" process and/or Routing Alternate Review is to ask for it, in a Petition. Each time that increased process has been requested, the Commission has Ordered increased process.

III. PLEASE ADD ANDERSEN AND COUNSEL TO SERVICE LIST

Please add Andersen and Counsel to the service list for both project dockets:

Donna J. Andersen Trust c/o Donna J. Andersen 1033 County Road E East. St. Paul, MN 55110 donnajandersen@gmail.com Carol A. Overland Legalectric 1110 West Avenue Red Wing, MN 55066 overland@legalectric.org

Donna J. Andersen and Curtis Andersen, and the Donna J. Andersen Trust, Donna J. Andersen, Trustee request Reconsideration of their Petition for Full Process and Contested Case and Intervention, denied on October 14, 2015.

October 15, 2015

Carol A. Overland MN #254617
Attorney for Donna J. Andersen and Curtis
Andersen, and the Donna J. Andersen

CarlAdvuland

Trust, Donna J. Andersen, Trustee
Legalectric – Overland Law Office
1110 West Avenue

Red Wing, MN 55066 (612) 227-8638

STATE OF MINNESOTA OFFICE OF ADMINISTRATIVE HEARINGS

FOR THE PUBLIC UTILITIES COMMISSION

In the Matter of the Application of Great River Energy and Minnesota Power for a Certificate of Need and Route Permit for the Menahga Area 115 kV Transmission Project in Hubbard, Wadena and Becker Counties, Minnesota PUC Docket No. ET-2,E-015/CN-14-787 PUC Docket No. ET-2,E-015/TL-14-797

OAH Docket No. 5-2500-32715

MOTION FOR RECONSIDERATION

Donna J. Andersen and Curtis Andersen, and the Donna J. Andersen Trust, Donna J. Andersen, Trustee (hereinafter "Andersen"), landowners on the route proposed for the Menahga Area 115 kV transmission Line Project (hereinafter "Menahga Project"), hereby submit this Motion for Reconsideration of their Petition for Full Process and Contested Case and Intervention, denied on October 14, 2015. These requests by Andersen were framed as a "Petition" because it is a request for action, and because Andersen is not currently an Intervenor, the court correctly notes that Andersen has no standing to file a Motion for Full Process and Contested Case and Intervention.

The order of the Order is backwards, taking the cart before the horse. The Order first denied the Petition to Intervene and "therefore" denied the Petition/Motion for Full Process and Referral for Contested Case and Additional Public Hearings. In the truncated Certificate of Need process under Minn. R. 7849.1200, and in Alternate Review for non-contested routing dockets, Minn. Stat. §216E.04, there is no opportunity for intervention. Intervention is participation as a party in a contested case. Thus, the Petition for a Contested Case must be addressed first, and

-

¹ Andersen and counsel note that neither were served with the October 14, 2015 Order.

then, if granted, the Petition for Intervention considered.

Andersen requests that the Order of October 14, 2015 be reconsidered, and that in the alternative, this request and the Petition for Full Process and Contested Case and Intervention be Certified to the Commission for consideration.

I. INTERVENTION

As noted in the order, "A person seeking to intervene in a hearing as a party must file "a timely petition to intervene." Order Memorandum, p. 2. There has been no intervention deadline established in these dockets by either the ALJ or the Commission. While unusual, that is the case in this docket.

At no time was Andersen informed that intervention was an available option. None of the notices received disclose intervention as an option, nor was Andersen informed of this option in communications with Commission and Commerce staff.

Where there is no contested case, there is no opportunity for Intervention. While there is under the rules opportunity to question witnesses at the Public Hearing, that has through history been unreasonably limited and even denied. Where there is Alternate Review with only a "Summary Report" there is no opportunity for Briefing or Exceptions. Where there is no Environmental Impact Statement, there is no opportunity to Comment on the draft EIS or the adequacy of the final EIS. Andersen's Petition for Intervention is secondary to the Petition for Contested Case, and is a request to participate as a party in broadened proceedings.

II. <u>CONTESTED CASE PROCEEDINGS</u>

Although the order states that "[t]here is no such legal procedure as a 'petition' to convert a public hearing to a contested case hearing," that was not requested -- the Petition specifically requested to convert the fast-track process of Minn. R. 7829.1200 and Routing

Alternative Review of Minn. Stat. §216E.04 to a full-process. And conversely, there is indeed such a legal procedure, and it has been utilized in the past by the public and by a utility applicant. That potential for increased process was both considered by the Commission in ordering the fast-track process in this case, and has indeed been requested and ordered by the Commission in past cases.

In its Order in this docket, the Commission acknowledged that there may be a need for contested case:

At this time there are no contested material facts, future factual disputes appear unlikely, and there are no other factors pointing to a need for contested case proceedings. The Commission will therefore authorize staff to develop the record and prepare this case for Commission action without contested case proceedings under Minn. Stat. §§14.57 *et seq.*, **unless those proceedings are later determined to be necessary.** Accordingly, the Commission will direct the use of the informal review process under Minn. R. 7829.1200 to develop the record for the certificate of need.

Order, March 18, 2015 (emphasis added). The Petition filed by Andersen is a request for an Order that "those proceedings are … determined to be necessary," and provided a number of reasons demonstrating that a contested case is necessary.

Minnesota statutes and case law are very clear on the importance of public participation, and in fact, a section of the Power Plant Siting Act is entitled exactly that and mandates open process:

216E.08 PUBLIC PARTICIPATION.

Subd. 2. Other public participation.

The commission shall adopt broad spectrum citizen participation as a principal of operation. The form of public participation shall not be limited to public hearings and advisory task forces and shall be consistent with the commission's rules and guidelines as provided for in section 216E.16.

Minn. Stat. 216E.08, Subd. 2.

In the past, the Commission has fast-tracked other transmission projects, and upon request, slowed the process down and opened it up to additional public participation, intervention, and agency

scrutiny. For example, the Chisago Transmission Project III was one such proceeding where this writer, on behalf of the City of Lindstrom, requested a Contested Case in a fast-tracked proceeding.² The Commission ordered a hybrid process to afford additional opportunities for public and intervenor participation.³

Another example may be found in the Hollydale transmission case, where, again, a proceeding was fast-tracked, and Plymouth Residents, a neighborhood association, requested conversion from Alternate Review to a full process review.⁴ In that docket, 20 days later, the Applicant, Xcel Energy, filed a Petition to Convert Route Permit Proceeding from an Alternative Permitting Process to a Full Permitting Process with the Commission.⁵ Subsequently, in this case the Commission also ordered increased process to facilitate public participation.⁶

The Commission has a history of recognizing that increased process is necessary, and in

2			=						
4015030	PUBLIC	06-1677		CN	CITY OF LINDSTROM		1	OTHERPETITION FOR CONTESTED CASE	
3									
4046664	PUBLIC	06-1677			TL	PUC		ORDER	05/02/2007
4									,
20122- 71234-01	PUBLIC	11-152		TL		MOUTH HOLLYI PROJEC		NOPPOSING DALE POWERLINE T-PETITION AND N FOR FULL ROUTING SS	02/06/2012
5									
<u>20122-</u> <u>71931-01</u>	PUBLIC	11-152		TL	POWER MINNE CORPO GREAT ENERG	THERN STATES ER COMPANY, A NESOTA PORATION AND AT RIVER RGY, A NOT-FOR- FIT COOPERATIVE		OTHERPETITION TO CONVERT ROUTE PERMIT PROCEEDING FROM AN ALTERNATIVE PERMITTING PROCESS TO A FULL PERMITTING PROCESS	02/27/2012
6									
20125- 74462-01	PUBLIC	11-152		TL	PUC H	ORDERNOTICE AND ORDER FOR HEARING UNDER MINNESOTA RULES CHAPTER 1405			05/04/2012

this case, recognized in its Order that possibility. There is established precedent in Commission proceedings for Petitions for a Contested Case, utilized by both the public and by an Applicant, and there is established precedent of Commission Orders to expand process to facilitate participation. The only way to convert an abbreviated process, such as the CoN "informal and expedited" process and/or Routing Alternate Review is to ask for it, in a Petition. Each time that increased process has been requested, the Commission has Ordered increased process.

III. PLEASE ADD ANDERSEN AND COUNSEL TO SERVICE LIST

Please add Andersen and Counsel to the service list for both project dockets:

Donna J. Andersen Trust c/o Donna J. Andersen 1033 County Road E East. St. Paul, MN 55110 donnajandersen@gmail.com Carol A. Overland Legalectric 1110 West Avenue Red Wing, MN 55066 overland@legalectric.org

Donna J. Andersen and Curtis Andersen, and the Donna J. Andersen Trust, Donna J. Andersen, Trustee request Reconsideration of their Petition for Full Process and Contested Case and Intervention, denied on October 14, 2015.

October 15, 2015

Carol A. Overland MN #254617
Attorney for Donna J. Andersen and Curtis
Andersen, and the Donna J. Andersen

CarlAdvuland

Trust, Donna J. Andersen, Trustee
Legalectric – Overland Law Office
1110 West Avenue

Red Wing, MN 55066 (612) 227-8638

STATE OF MINNESOTA OFFICE OF ADMINISTRATIVE HEARINGS

FOR THE PUBLIC UTILITIES COMMISSION

In the Matter of the Application of Great River Energy and Minnesota Power for a Certificate of Need and Route Permit for the Menahga Area 115 kV Transmission Project in Hubbard, Wadena and Becker Counties, Minnesota PUC Docket No. ET-2,E-015/CN-14-787 PUC Docket No. ET-2,E-015/TL-14-797

OAH Docket No. 5-2500-32715

MOTION FOR RECONSIDERATION

Donna J. Andersen and Curtis Andersen, and the Donna J. Andersen Trust, Donna J. Andersen, Trustee (hereinafter "Andersen"), landowners on the route proposed for the Menahga Area 115 kV transmission Line Project (hereinafter "Menahga Project"), hereby submit this Motion for Reconsideration of their Petition for Full Process and Contested Case and Intervention, denied on October 14, 2015. These requests by Andersen were framed as a "Petition" because it is a request for action, and because Andersen is not currently an Intervenor, the court correctly notes that Andersen has no standing to file a Motion for Full Process and Contested Case and Intervention.

The order of the Order is backwards, taking the cart before the horse. The Order first denied the Petition to Intervene and "therefore" denied the Petition/Motion for Full Process and Referral for Contested Case and Additional Public Hearings. In the truncated Certificate of Need process under Minn. R. 7849.1200, and in Alternate Review for non-contested routing dockets, Minn. Stat. §216E.04, there is no opportunity for intervention. Intervention is participation as a party in a contested case. Thus, the Petition for a Contested Case must be addressed first, and

_

¹ Andersen and counsel note that neither were served with the October 14, 2015 Order.

then, if granted, the Petition for Intervention considered.

Andersen requests that the Order of October 14, 2015 be reconsidered, and that in the alternative, this request and the Petition for Full Process and Contested Case and Intervention be Certified to the Commission for consideration.

I. INTERVENTION

As noted in the order, "A person seeking to intervene in a hearing as a party must file "a timely petition to intervene." Order Memorandum, p. 2. There has been no intervention deadline established in these dockets by either the ALJ or the Commission. While unusual, that is the case in this docket.

At no time was Andersen informed that intervention was an available option. None of the notices received disclose intervention as an option, nor was Andersen informed of this option in communications with Commission and Commerce staff.

Where there is no contested case, there is no opportunity for Intervention. While there is under the rules opportunity to question witnesses at the Public Hearing, that has through history been unreasonably limited and even denied. Where there is Alternate Review with only a "Summary Report" there is no opportunity for Briefing or Exceptions. Where there is no Environmental Impact Statement, there is no opportunity to Comment on the draft EIS or the adequacy of the final EIS. Andersen's Petition for Intervention is secondary to the Petition for Contested Case, and is a request to participate as a party in broadened proceedings.

II. <u>CONTESTED CASE PROCEEDINGS</u>

Although the order states that "[t]here is no such legal procedure as a 'petition' to convert a public hearing to a contested case hearing," that was not requested -- the Petition specifically requested to convert the fast-track process of Minn. R. 7829.1200 and Routing

Alternative Review of Minn. Stat. §216E.04 to a full-process. And conversely, there is indeed such a legal procedure, and it has been utilized in the past by the public and by a utility applicant. That potential for increased process was both considered by the Commission in ordering the fast-track process in this case, and has indeed been requested and ordered by the Commission in past cases.

In its Order in this docket, the Commission acknowledged that there may be a need for contested case:

At this time there are no contested material facts, future factual disputes appear unlikely, and there are no other factors pointing to a need for contested case proceedings. The Commission will therefore authorize staff to develop the record and prepare this case for Commission action without contested case proceedings under Minn. Stat. §§14.57 *et seq.*, **unless those proceedings are later determined to be necessary.** Accordingly, the Commission will direct the use of the informal review process under Minn. R. 7829.1200 to develop the record for the certificate of need.

Order, March 18, 2015 (emphasis added). The Petition filed by Andersen is a request for an Order that "those proceedings are … determined to be necessary," and provided a number of reasons demonstrating that a contested case is necessary.

Minnesota statutes and case law are very clear on the importance of public participation, and in fact, a section of the Power Plant Siting Act is entitled exactly that and mandates open process:

216E.08 PUBLIC PARTICIPATION.

Subd. 2. Other public participation.

The commission shall adopt broad spectrum citizen participation as a principal of operation. The form of public participation shall not be limited to public hearings and advisory task forces and shall be consistent with the commission's rules and guidelines as provided for in section 216E.16.

Minn. Stat. 216E.08, Subd. 2.

In the past, the Commission has fast-tracked other transmission projects, and upon request, slowed the process down and opened it up to additional public participation, intervention, and agency

scrutiny. For example, the Chisago Transmission Project III was one such proceeding where this writer, on behalf of the City of Lindstrom, requested a Contested Case in a fast-tracked proceeding.² The Commission ordered a hybrid process to afford additional opportunities for public and intervenor participation.³

Another example may be found in the Hollydale transmission case, where, again, a proceeding was fast-tracked, and Plymouth Residents, a neighborhood association, requested conversion from Alternate Review to a full process review.⁴ In that docket, 20 days later, the Applicant, Xcel Energy, filed a Petition to Convert Route Permit Proceeding from an Alternative Permitting Process to a Full Permitting Process with the Commission.⁵ Subsequently, in this case the Commission also ordered increased process to facilitate public participation.⁶

The Commission has a history of recognizing that increased process is necessary, and in

2			_						
4015030	PUBLIC	06-1677		CN		1.		ERPETITION FOR TESTED CASE	04/09/2007
3									
4046664	PUBLIC	06-1677			TL	PUC		ORDER	05/02/2007
4		_							
20122- 71234-01	PUBLIC	11-152		TL	PLYMO RESIDE	MOUTH HOLLYI PROJEC		NOPPOSING DALE POWERLINE T-PETITION AND N FOR FULL ROUTING SS	02/06/2012
5									
<u>20122-</u> <u>71931-01</u>	PUBLIC	11-152		TL	POWER MINNES CORPO GREAT ENERG	RATION AND		OTHERPETITION TO CONVERT ROUTE PERMIT PROCEEDING FROM AN ALTERNATIVE PERMITTING PROCESS TO A FULL PERMITTING PROCESS	02/27/2012
6									
20125- 74462-01	PUBLIC	11-152		TL	PUC HI	ORDERNOTICE AND ORDER FOR HEARING UNDER MINNESOTA RULES CHAPTER 1405			05/04/2012

this case, recognized in its Order that possibility. There is established precedent in Commission proceedings for Petitions for a Contested Case, utilized by both the public and by an Applicant, and there is established precedent of Commission Orders to expand process to facilitate participation. The only way to convert an abbreviated process, such as the CoN "informal and expedited" process and/or Routing Alternate Review is to ask for it, in a Petition. Each time that increased process has been requested, the Commission has Ordered increased process.

III. PLEASE ADD ANDERSEN AND COUNSEL TO SERVICE LIST

Please add Andersen and Counsel to the service list for both project dockets:

Donna J. Andersen Trust c/o Donna J. Andersen 1033 County Road E East. St. Paul, MN 55110 donnajandersen@gmail.com Carol A. Overland Legalectric 1110 West Avenue Red Wing, MN 55066 overland@legalectric.org

Donna J. Andersen and Curtis Andersen, and the Donna J. Andersen Trust, Donna J. Andersen, Trustee request Reconsideration of their Petition for Full Process and Contested Case and Intervention, denied on October 14, 2015.

October 15, 2015

Carol A. Overland MN #254617
Attorney for Donna J. Andersen and Curtis
Andersen, and the Donna J. Andersen
Trust, Donna J. Andersen, Trustee
Legalectric – Overland Law Office
1110 West Avenue

CarlAdvuland

Red Wing, MN 55066 (612) 227-8638