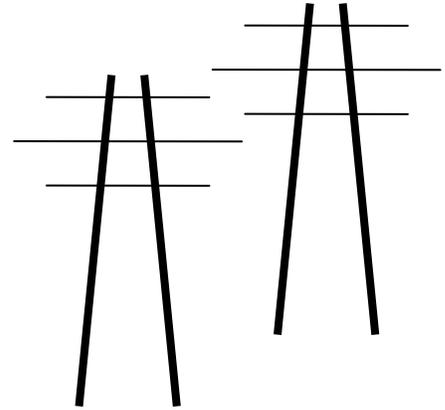


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July 20, 2015

Christopher Moseng
Public Utilities Commission
121 – 7th Place E., Suite 350
St. Paul, MN 55101

eFiled only

RE: Comment on Proposed Rulemaking
PUC Docket: R-13-24

Dear Mr. Moseng:

Thank you for the opportunity to comment on the proposed Chapter 7829 Rule changes over the last few years. I am making this comment as an individual and not in the course of representation of any party.

Please note that I would like to address the Commission tomorrow.

Yesterday I reviewed the staff briefing papers, and noted this section:

I. Relevant Documents

Proposed Rules published in the <i>State Register</i>	June 12, 2015
Statement of Need and Reasonableness	June 12, 2015
Comments, Minnesota Department of Commerce.....	July 15, 2015
Comments, Minnesota Cable Communications Association.....	July 17, 2015
Comments, Minnesota Department of Natural Resources.....	July 17, 2015

My Comment in support of the DNR request is not listed, perhaps because it was filed on July 20, in response to the DNR comment. The issues raised by the DNR are important and have come up frequently in my representation of intervenors before the Commission. The DNR, thankfully, is well aware of the difficulty of tracking and participating in dockets and has ramped up its participation. However, historically, I've observed the too common failure of agencies to be proactively requested to weigh in, and of Commerce, ALJ, and Commission failure to appropriately take note of agency Comments. These issues have been repeatedly raised by myself and others in the proceedings, at multiple Power Plant Siting Act Annual Hearings, and in the Ch. 7849/7850 rulemaking.

This DNR proposal has merit. It is not clear that it would be addressed in the Ch. 7849 and 7850 rulemaking, now in its final revision before presentation to the Commission, as suggested in the Briefing Papers. If it is the Commission's intent to have this issue of agency participation addressed in that rulemaking, rather than this 7829 rulemaking, then I ask that the Commission state that in its order.

I request some time to address the Commission tomorrow about this rulemaking and the final rule, both procedure and substantive issues

Thank you for your consideration of these matters. Please let me know if you have any questions or require anything further.

Very truly yours,

A handwritten signature in cursive script that reads "Carol A. Overland".

Carol A. Overland
Attorney at Law

cc: eService List