



**Minnesota Center for
Environmental Advocacy**

July 20, 2021

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East Suite 350
St. Paul, MN 55101-2147

VIA E-FILING

*Re: In the Matter of the Petition to Transfer a portion of the Route Permit for the HVD
Transmission Line System and Associated Facilities in Minnesota
PUC Docket No. ET2/TL-21-434*

Dear Mr. Seuffert:

Minnesota Center for Environmental Advocacy (“MCEA”) and Clean Energy Organizations¹ (“CEOs”) submit this request for an extension of time to comment on the Petition to Transfer the Minnesota portion of the Route Permit for the Great River Energy (“GRE”) High Voltage DC Transmission Line and its associated facilities. In addition, for the reasons set forth below, the Commission should schedule a public meeting, pursuant to Minn. R. 7850.5000, subp. 2 in order to allow for additional public input on this matter. Finally, MCEA and CEOs intend to request intervention as parties in this docket.

MCEA and CEOs are researching publicly available information regarding the transfer of the transmission line and the capacity of the transferee, Nexus Line, LLC, to comply with the conditions of the Permit, as well as the transmission line transfer’s relationship to the related asset transaction between GRE and Nexus Line, LLC’s affiliates. MCEA and CEOs believe that having additional time to complete this research is necessary for both CEOs and other interested parties to contribute to the Commission’s record. Additionally, the public should have more information about the proposed transfer of the permit, the capacity of the transferee to comply with the permit conditions, and the impacts of the transfer on cooperative members and the public. Minnesotan ratepayers of GRE’s member-cooperatives paid for that line over the last 40 years, including \$130 million in upgrades over the last few years. Given this investment, the Commission should not rush this docket. The public interest demands sufficient time and more information to evaluate the costs, benefits, and risks of the transfer as well as potential implications for the climate, and for the financial burdens on rate-paying Minnesotans.

Prior to setting a new deadline for comments, Great River Energy should provide the following information to the public and the Commission:

- The general terms of both GRE’s new Power Purchase Agreement with Nexus Line, LLC’s affiliate and GRE’s Asset Purchase Agreement with Nexus Line, LLC;

¹ Clean Energy Organizations consist of Sierra Club, Fresh Energy, and Clean Up the River Environment (CURE)

- What resources are currently using the HVDC line, any anticipated changes to usage, and if those changes are a result of this proposed ownership change;
- The estimated carbon impacts of the transfer in order to assess the transfer's effect on the emission reduction goals of Minn. Stat. Ch. 216H;
- The estimated cost impacts of the transfer and the cost impacts of the full transaction of which the transfer is part; and
- The corporate structure of Nexus Line, LLC and its parent companies, subsidiaries and affiliates, a list of all entities possessing ownership interests in Nexus Line, LLC, and Nexus Line, LLC's past experience operating and maintaining transmission lines and complying with line permits

The HVDC line is an immensely valuable asset in today's transmission-constrained market, and its transfer will have a material impact on Great River Energy's member-owners and on Minnesota climate process for decades to come. Therefore, MCEA and CEOs respectfully request an indefinite extension, until Great River Energy reasonably provides the above-listed additional information through public channels to allow interested parties, including its customers, the opportunity to review the information. At that time, parties, customers and the public will be in a position to submit informed comments so that the Commission has a complete record before ruling on this Petition.

If the Commission has questions, please contact Evan Mulholland at 651-287-4889.

Sincerely,

/s/Ellen Anderson
Ellen Anderson
Climate Program Director
Minnesota Center for Environmental Advocacy

/s/Kristin A. Henry
Kristin A. Henry
Managing Attorney
Sierra Club

/s/Evan Mulholland
Evan Mulholland
Senior Supervising Attorney
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/s/Allen Gleckner
Allen Gleckner
Lead Director, Clean Electricity
Fresh Energy

/s/Duane Ninneman
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Executive Director
Clean Up the River Environment, CURE

EA/EJM/ad
cc: PUC Electronic Service Recipients