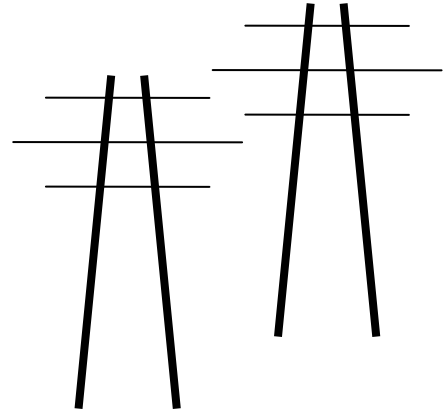


# Legalelectric, Inc.

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November 19, 2013

Burl Haar  
Executive Secretary  
Minnesota Public Utilities Commission  
121 – 7<sup>th</sup> Place East, Suite 350  
St. Paul, MN 55101

eFiled & emailed: burl.haar@state.mn.us

RE: Not-So-Great Northern Transmission Line  
PUC Docket E-015/CN-12-1163

Dear Dr. Haar:

I am submitting these comments as an individual, and not in the course of representation of any party.

Comments in response to the Commission's October 22, 2013 Notice are due today, and the Notice stated:

**Topic/s Open for Comment:**

- Does the application contain the information required by Minnesota Rules, part 7849.0220, subpart 2?
- Are there any contested issues of fact with respect to the representations made in the application?

My comments are brief:

- Essentially, the application contains the information required by Minnesota Rules, part 7849.0220, subpart 2. The information is sparse, but will be filled in, I trust, during the contested case proceeding.
- I find it rather bizarre that this second question is asked. This is a three hundred plus mile 500 kV transmission line that requires a special permit for crossing the Manitoba-U.S. Border, also crossing at least one reservation in the U.S. The “need” statement is flimsy at best, claiming a 250 MW power purchase agreement with Manitoba for a line

with a capacity many times greater than the need. The “Large Utility Intervenors” (please identify!!) put it succinctly:

Given the cost of the Great Northern Transmission Line, the issues surrounding various routes and alternatives , and the potential for consideration of related issues such as reliability, industrial load growth, and increased demand for renewable generation, there are numerous potential contested material issues of fact.

Given the magnitude of this project and the many aspects of a need determination at issue, it should be referred to OAH for a contested case hearing.

Thank you for the opportunity to submit these Comments.

Very truly yours,

A handwritten signature in cursive script that reads "Carol A. Overland". The signature is written in black ink and is positioned above the typed name.

Carol A. Overland  
Attorney at Law