



33 South Sixth Street, Suite 4200
Minneapolis, Minnesota 55402
main 612.373.8800
fax 612.373.8881
www.stoel.com

November 19, 2013

ANDREW P. MORATZKA
Direct (612) 373-8822
apmoratzka@stoel.com

VIA E-FILING

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

**Re: In the Matter of the Petition of the Application of Minnesota Power for a
Certificate of Need for the Great Northern High-Voltage Transmission Line
Project
PUC Docket No. E-015/CN-12-1163**

Dear Dr. Haar:

In response to the notice of comment from the Minnesota Public Utilities Commission (the "Commission") dated October 22, 2013 (the "Notice of Comment"), the group of retail customers known as the Large Power Intervenors ("LPI")¹ respectfully submits this brief letter for the Commission's consideration.

The Notice of Comment solicits input on two issues, completeness and contested case treatment. LPI submits this brief note on the latter issue. 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. Minnesota Power's

¹ ArcelorMittal USA (Minorca Mine); Boise, Inc.; Enbridge Energy, Limited Partnership; Hibbing Taconite Company; Mesabi Nugget Delaware, LLC; NewPage Corporation; PolyMet Mining, Inc.; Sappi Cloquet, LLC; UPM – Blandin Paper Company; USG Interiors, LLC; United States Steel Corporation (Keewatin Taconite and Minntac Mine); and United Taconite, LLC.



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application for a certificate of need should therefore be referred to the Office of Administrative Hearings for contested case treatment.

Very truly yours,

Stoel Rives LLP

/s/ Andrew P. Moratzka

Andrew P. Moratzka

APM:kap
Enclosures
cc: Service List

CERTIFICATE OF SERVICE

I, Kathy Prestidge, hereby certify that I have this day, served a true and correct copy of the following documents to all persons at the addresses indicated below or on the attached list by electronic filing, electronic mail, courier, interoffice mail or by depositing the same enveloped with postage paid in the United States Mail at Minneapolis, Minnesota.

*Large Power Intervenors' Letter Comment in Response to the Notice of
Comment from the Minnesota Public Utilities Commission dated October 22,
2013*

**In the Matter of the Petition of the Application of Minnesota Power for a Certificate of
Need for the Great Northern High-Voltage Transmission Line Project
PUC Docket No. E-015/CN-12-1163**

Dated this 19th day of November, 2013.

/s/ Kathy Prestidge

Kathy Prestidge

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Robert J	Acheson	conbuenafe@yahoo.com		1722 41ST ST NW APT 3 Rochester, MN 55901-1301	Paper Service	No	OFF_SL_12-1163_Official
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_12-1163_Official
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	Yes	OFF_SL_12-1163_Official
Jim	Atkinson	jbatkinson@allete.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_12-1163_Official
Maryann	Bartos	N/A		119 Brock Ln Grand Rapids, MN 55744-9211	Paper Service	No	OFF_SL_12-1163_Official
Bruce	Beckstrom	N/A		8924 Swan Lake Road Alborn, MN 55702	Paper Service	No	OFF_SL_12-1163_Official
Peter	Bellig	N/A		207 Cedar Cliff Rd Redwood Falls, MN 56283	Paper Service	No	OFF_SL_12-1163_Official
James R. and Sandra L.	Berge	slberge@rtconnect.net		31 South Summit Aveue Newcastle, WY 82701	Paper Service	No	OFF_SL_12-1163_Official
Michelle F.	Bissonnette		HDR Engineering, Inc.	Golden Hills Office Center 701 Xenia Avenue South, Suite 600 Minneapolis, MN 55416	Paper Service	No	OFF_SL_12-1163_Official
Michelle	Bouta	N/A	Upper Minnesota Valley Regional	323 W Schleiman Ave Appleton, MN 56208	Paper Service	No	OFF_SL_12-1163_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kathy	Boutin	kboutin57@gmail.com		PO Box 426 Little Fork, MN 56653	Paper Service	No	OFF_SL_12-1163_Official
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174 Lake Elmo, MN 55042	Paper Service	No	OFF_SL_12-1163_Official
Wanda	Davies	wdavies@windpower.com	Gamesa Energy USA, Great Plains Region	3001 Broadway St. NE, Suite 695 Minneapolis, MN 55413	Paper Service	No	OFF_SL_12-1163_Official
Hadley	Davis	N/A	Sierra Club	85 Second St San Francisco, MN 94105	Paper Service	No	OFF_SL_12-1163_Official
Mike	Dobb	mjdobb@aol.com		14713 Rivergrove Dr E Sumner, WA 98390	Paper Service	No	OFF_SL_12-1163_Official
Michael	Dolan	mjdolan@dolan-mn.com		6117 Scotia Drive Edina, MN 55439	Paper Service	No	OFF_SL_12-1163_Official
Jeremy	Duehr	jduehr@fredlaw.com	Fredrikson & Byron, P.A.	200 South Sixth Street Suite 4000 Minneapolis, Minnesota 55402-1125	Electronic Service	No	OFF_SL_12-1163_Official
Cal	Dufault	Cal.Dufault@nrgenergy.com	NRG Energy	14893 Wilds Pkwy NW Prior Lake, MN 55372	Paper Service	No	OFF_SL_12-1163_Official
Ledy	Dunkle	N/A	Aldridge Electric	844 E Rockland Rd Libertyville, IL 60498-3358	Paper Service	No	OFF_SL_12-1163_Official
John	Dunn	N/A		N3473 County Road K Mauston, WI 53948	Paper Service	No	OFF_SL_12-1163_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Patrick	Edwards	N/A		10006 305th St W Northfield, MN 55057	Paper Service	No	OFF_SL_12-1163_Official
Jeff	Ehm	jehm@corvalgroup.com	Corval Group	1633 Eustis St Saint Paul, MN 55108	Electronic Service	No	OFF_SL_12-1163_Official
Kristen	Eide Tollefson	HealingSystems@earthlink.net	R-CURE	P O Box 129 Frontenac, MN 55026	Paper Service	No	OFF_SL_12-1163_Official
Paul and Ruth	Erickson	perickson@earthlink.net		2737 Lynn Ave S. St. Louis Park, MN 55416	Paper Service	No	OFF_SL_12-1163_Official
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_12-1163_Official
Dale	Fredrickson			12406 347th Street Lindstrom, MN 55045	Paper Service	No	OFF_SL_12-1163_Official
Bruce	Freeman	bruce.freeman@avantenergy.com	Avant Energy, Inc	220 South Sixth St Ste 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_12-1163_Official
Travis	Germundson	travis.germundson@state.mn.us		Board of Water & Soil Resources 520 Lafayette Rd Saint Paul, MN 55155	Electronic Service	No	OFF_SL_12-1163_Official
Elizabeth	Goodpaster	bgoodpaster@mncenter.org	MN Center for Environmental Advocacy	Suite 206 26 East Exchange Street St. Paul, MN 551011667	Electronic Service	No	OFF_SL_12-1163_Official
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_12-1163_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Heidi	Hahn	N/A		4778 Chester Ave Webster, MN 55088	Paper Service	No	OFF_SL_12-1163_Official
Eric	Hansen	N/A	Pinnacle Engineering Inc.	11541 95th Ave N Maple Grove, MN 55369	Paper Service	No	OFF_SL_12-1163_Official
Linda	Hanson	elcshk5@yahoo.com	W.O.L.F., Inc.	W1806 Wilson Road Hawkins, WI 54530	Paper Service	No	OFF_SL_12-1163_Official
Randy, Rose	Haseleu	N/A		420 Hoyt Ave S Springfield, MN 56087	Paper Service	No	OFF_SL_12-1163_Official
Vickie	Hessenius	N/A	CERTs	69144 270th St Dexter, MN 55926	Paper Service	No	OFF_SL_12-1163_Official
Margaret	Hodnik	mhodnik@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_12-1163_Official
Mary	Holly	mholly@winthrop.com	Winthrop & Weinstine, P.A.	225 South Sixth Street, Suite 3500 Minneapolis, MN 55402	Paper Service	No	OFF_SL_12-1163_Official
Jason	Hoskins	N/A	Ulteig Engineers	4285 Lexington Ave N Saint Paul, MN 55126	Paper Service	No	OFF_SL_12-1163_Official
Rick	Howden	N/A	Congressman Tim Walz	227 E Main St Ste 220 Mankato, MN 56001	Paper Service	No	OFF_SL_12-1163_Official
Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_12-1163_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Linda	Jensen	linda.s.jensen@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota Street St. Paul, MN 551012134	Electronic Service	No	OFF_SL_12-1163_Official
Jodi	Johnson	jjjohnson@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802-2010	Electronic Service	No	OFF_SL_12-1163_Official
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_12-1163_Official
Karen	Kromar	karen.kromar@state.mn.us	MN Pollution Control Agency	520 Lafayette Rd Saint Paul, MN 55155	Electronic Service	No	OFF_SL_12-1163_Official
Mary Jo	Lange	grammaj@paulbunyan.net		PO Box 173 Blackduck, MN 56630-0173	Paper Service	No	OFF_SL_12-1163_Official
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_12-1163_Official
James D.	Larson	james.larson@avantenergy.com	Avant Energy Services	220 S 6th St Ste 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_12-1163_Official
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_12-1163_Official
Kim	Lindquist	kim.lindquist@ci.rosemount.mn.us		2875 145th St W Rosemount, MN 55068	Electronic Service	No	OFF_SL_12-1163_Official
Susan	Ludwig	sludwig@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_12-1163_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kyle	MacLaury	N/A		212 3rd Ave N Ste 560 Minneapolis, MN 55401	Paper Service	No	OFF_SL_12-1163_Official
Dorree	Madison	dmdmadison@gmail.com		Rondeau/Madison Effie Property 11691 W Splithand Rd Grand Rapids, MN 55744-5847	Paper Service	No	OFF_SL_12-1163_Official
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_12-1163_Official
Roger	Mickelson	N/A		127 Parkview Dr Trenton, IL 62293-1746	Paper Service	No	OFF_SL_12-1163_Official
Steven	Mittelstaedt	N/A		32097 Sanborn Dr Montgomery, MN 56069	Paper Service	No	OFF_SL_12-1163_Official
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_12-1163_Official
Aaron	Moline	AaronM@pennwell.com	PennWell Corporation	1455 West Loop S Ste 400 Houston, TX 77027-9501	Electronic Service	No	OFF_SL_12-1163_Official
Andrew	Moratzka	apmoratzka@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_12-1163_Official
Steven R.	Olson	olsoncpa@mncable.net		P.O. Box 581 Thief River Falls, MN 56701	Paper Service	No	OFF_SL_12-1163_Official
Elling	Olson	N/A	M A Mortenson Co	700 Meadow Ln N Minneapolis, MN 55422	Paper Service	No	OFF_SL_12-1163_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	OFF_SL_12-1163_Official
Tawnya	Panek	tpanek@gmail.com		27127 130th Ave NW Newfolden, MN 56738	Paper Service	No	OFF_SL_12-1163_Official
Michael	Pangborn	N/A	NextEra Energy Resources	14000 Sundial Ct Eden Prairie, MN 55346	Paper Service	No	OFF_SL_12-1163_Official
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_12-1163_Official
Angela	Piner	angela.piner@hdrinc.com	HDR, Inc.	Suite 600 701 Xenia Avenue South Suite 600 Minneapolis, MN 55416	Electronic Service	No	OFF_SL_12-1163_Official
Jay	Porter	jporter@GREnergy.com	Great River Energy	12300 Elm Creek Blvd Maple Grove, MN 55369	Electronic Service	No	OFF_SL_12-1163_Official
David	Richardson	N/A	AMEC	800 Marquette Ave Ste 1200 Midwest Plaza Bldg Minneapolis, MN 55420-2876	Paper Service	No	OFF_SL_12-1163_Official
Christian	Rieck	N/A		2819 167th LN NW Andover, MN 55304	Paper Service	No	OFF_SL_12-1163_Official
Stoei	Rivesllp	N/A		33 S 6th St Ste 4200 Minneapolis, MN 55402	Paper Service	No	OFF_SL_12-1163_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Dan L.	Sanford	N/A	American Transmission Company LLC	W234 N2000 Ridgeview Pkwy Court Waukesha, WI 53188-1022	Paper Service	No	OFF_SL_12-1163_Official
Thomas	Scharff	thomas.scharff@newpagecorp.com	New Page Corporation	P.O. Box 8050 610 High Street Wisconsin Rapids, WI 544958050	Electronic Service	No	OFF_SL_12-1163_Official
Tod	Sherman	tod.sherman@dot.state.mn.us	Mn/DOT Metro District	Waters Edge 1500 West County Road B2 Roseville, MN 55113	Electronic Service	No	OFF_SL_12-1163_Official
Beth H.	Soholt	bsoholt@windonthewires.org	Wind on the Wires	570 Asbury Street Suite 201 St. Paul, MN 55104	Electronic Service	No	OFF_SL_12-1163_Official
Adam	Sokolski	adam.sokolski@iberdrolaren.com	Iberdrola Renewables	701 fourth Avenue South Suite 1010 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_12-1163_Official
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_12-1163_Official
Tony	Sullins	N/A	U.S. Fish and Wildlife Service	Twin Cities Ecological Services Field Office 4101 American Blvd. E. Bloomington, MN 55425	Paper Service	No	OFF_SL_12-1163_Official
Wayne D.	Suoja	wsuoja@frontiernet.net		1029 Eales Rd Tower, MN 55790	Paper Service	No	OFF_SL_12-1163_Official
Eric	Swanson	eswanson@winthrop.com	Winthrop Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_12-1163_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Steven	Swenson	N/A	Pipestone Publishing	115 2nd St NE PO Box 277 Pipestone, MN 56164	Paper Service	No	OFF_SL_12-1163_Official
Kenneth	Thompson	kengt45@comcast.net		4555 Twin Lakes Rd Cumming, GA 30040	Paper Service	No	OFF_SL_12-1163_Official
SaGonna	Thompson	Regulatory.Records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_12-1163_Official
Karen	Turnboom	karen.turnboom@newpagecorp.com	NewPage Corporation	100 Central Avenue Duluth, MN 55807	Electronic Service	No	OFF_SL_12-1163_Official
Emily	Ulmer	N/A	Sierra Club	85 2nd St FL 2 San Francisco, CA 94105	Paper Service	No	OFF_SL_12-1163_Official
Laurance R.	Waldoch	lwaldoch@lindquist.com	Lindquist & Vennum	4200 IDS Center 80 South 8th Street Minneapolis, MN 554022274	Paper Service	No	OFF_SL_12-1163_Official
Rick	Wetterlind	N/A		5790 Hwy 53 Saginaw, MN 55779	Paper Service	No	OFF_SL_12-1163_Official
Michael	Wilburn	mwilburn@stresscrete3.com	The StressCrete Group	14503 Wallick Rd Atchison, MN 66002	Electronic Service	No	OFF_SL_12-1163_Official
Guy	Wolf		Board Member of Clean Wisconsin	N3421 Mohawk Valley Road Stoddard, WI 54658	Paper Service	No	OFF_SL_12-1163_Official