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December 3, 2013

**VIA ELECTRONIC FILING**

Dr. Burl W. Haar  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, MN 55101-2147

Re: In the Matter of the Request by Minnesota  
Power for a Certificate of Need for the  
Great Northern Transmission Line  
Docket No. E015/CN-12-1163

Dear Dr. Haar:

Minnesota Power hereby electronically submits its Reply Comments on Completeness in the above-referenced Docket. An Affidavit of Service is included.

Please contact me at the number above should you have any questions related to this filing.

Yours truly,

David R. Moeller

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Attachments  
c: Service List



**STATE OF MINNESOTA  
BEFORE THE  
MINNESOTA PUBLIC UTILITIES COMMISSION**

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In the Matter of the Request by Minnesota  
Power for a Certificate of Need for the  
Great Northern Transmission Line

Docket No. E-015/CN-12-1163

**MINNESOTA POWER  
REPLY COMMENTS  
ON COMPLETENESS**

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Minnesota Power provides these Reply Comments to initial comments filed in response to the Minnesota Public Utilities Commission (“Commission”) October 22, 2013 Notice in the above-referenced Docket. Minnesota Power agrees with all the commenters that a contested case is the correct procedure to ensure the Commission has the necessary record in which to make its decision under Minn. Stat. § 216B.243. Minnesota Power also agrees that the Application is complete and appreciates the Department of Commerce’s (“Department”) review of the Commission rule and order requirements.

In regards to the comments filed by the Regional Utilities, Minnesota Power agrees that before approving the Great Northern Transmission Line (“GNTL Project”), the Commission requires a full record that includes an evaluation of all feasible alternatives. Minnesota Power understands that it must show that the GNTL Project best serves the interests of its ratepayers and the public after evaluating those alternatives. For that reason, Minnesota Power devoted substantial discussion to the Fargo Area Study Concept (“Concept”), under the alternatives analysis required by Minn. Rules 7849.0260(B).

While the Regional Utilities briefly discuss the Concept, Minnesota Power is unsure if the Regional Utilities intended to provide a formal alternative project which they ask the Commission to consider under Minn. Rules 7849.0110, or whether they view the Concept as a hypothetical scenario that can test the suitability of the GNTL Project under the alternatives analysis required by Minn. Rules 7849.0260. If the Regional Utilities intend to provide an

alternative project that would replace the GNTL Project, they have thus far failed to present any analysis and support necessary for the Commission to consider whether the Concept meets the need set forth in Minnesota Power's Application. If the Regional Utilities intend to offer the Concept as a formal alternative, they must provide more than just a belief that this proposal could be developed. They will need to concretely demonstrate that the Concept meets all the Certificate of Need criteria. That proof will require demonstrating, among other things: (1) that the Concept can actually be built to meet Minnesota Power's needs; (2) that the Concept would actually be funded and how it would be funded; (3) that the Concept has willing partners; and (4) that the rate and other impacts of building the Concept best meet the interests of Minnesota Power's ratepayers and the public. If, on the other hand, the Regional Utilities agree that the Concept is an alternative hypothetical scenario that should be considered as part of the alternatives analysis under Minn. Rules 7849.0260, then Minnesota Power agrees.


The GNTL Project is the result of extensive planning, preparation and commitment. Minnesota Power has advanced its resource and transmission planning, gained Commission approval of its 2013 Integrated Resource Plan that included the GNTL Project, and obtained Commission approval of a 250 MW power purchase agreement ("PPA") with Manitoba Hydro that includes contractual covenants to build new international transmission. Based upon this work and these prior approvals, Minnesota Power conducted significant stakeholder and agency outreach, and is in the process of finalizing proposed routes for both the Minnesota and federal Presidential Permit application processes. Moreover, Minnesota Power has worked with Manitoba Hydro to develop a fully participant funded transmission line, that does not require waiting for cost sharing approval by MISO.

Subject to Commission approval of the Certificate of Need for the GNTL Project, all of this upfront work will enable a June 1, 2020 in-service date as required under the PPA. At most it appears that the Regional Utilities have conducted additional transmission studies around the Concept. The Regional Utilities' vague reference to these additional studies may be an attempt to position them for an intervention under Minn. Rules 7829.0800. However, at this time, the Regional Utilities do not appear to have a unique interest in the Project – a fully participant funded transmission line – particularly considering that the Department will represent the interests of Minnesota ratepayers and the public.

In conclusion, Minnesota Power requests that the Commission accept the Application as complete and send the review of the Great Northern Transmission Line Project to the Office of Administrative Hearings for a contested case proceeding.

Dated: December 3, 2013

Respectfully submitted,

A handwritten signature in black ink that reads "David R. Moeller". The signature is written in a cursive, flowing style.

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