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November 19, 2013

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**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”)<sup>1</sup> 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

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<sup>1</sup> 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*

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Kathy Prestidge

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