

October 25, 2018

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: Comments of the Minnesota Department of Commerce, Division of Energy Resources
Docket No. IP6964 /CN-16-289

Dear Mr. Wolf:

On September 27, 2018, the Minnesota Department of Commerce, Division of Energy Resources (Department) filed comments in the above-referenced docket, recommending that the Minnesota Public Utilities Commission (Commission) refrain from approving the Nobles 2 Power Partners, LLC's Certificate of Need until certain issues are resolved.

On October 10, 2018 the Commission issued a notice stating that "[t]he Commission requests clarification from the parties to identify their positions, evaluate the effect of the filing and develop a process going forward." Topics open for comment include:

- What procedural steps should the Commission undertake prior to a decision on the merits of the certificate of need petition?
- Should the Commission proceed with a review of the certificate of need application?
- Are there other issues or concerns related to this matter?

At this time the Department intends to file supplemental comments in this proceeding, responding to the October 5, 2018 reply comments of Nobles 2 Power Partners, LLC and Minnesota Power, a public utility operating division of ALLETE, Inc. The Department recommends that the Commission take no action until the Department is able to file the supplemental comments. Once the Department's supplemental comments are filed the Commission should be able to proceed with a final determination on the certificate of need application.

Sincerely,

/s/ STEVE RAKOW
Analyst Coordinator

SR/ja

CERTIFICATE OF SERVICE

I, Linda Chavez, hereby certify that I have this day served copies of the following document on the attached list of persons by electronic filing, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

MINNESOTA DEPARTMENT OF COMMERCE – COMMENTS

Docket Nos. **IP6964/CN-16-289**

Dated this **25th** day of **October, 2018**.

/s/Linda Chavez

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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