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June 18, 2024

VIA E-FILING

The Honorable Jim Mortenson
Administrative Law Judge
Office of Administrative Hearings
PO Box 64620
600 N. Robert Street
St. Paul, MN 55164-0620

**RE: In the Matter of the Application of Minnesota Power for a Certificate of Need for the HVDC Modernization Project in Hermantown, Saint Louis County
MPUC Docket No. E-015/CN-22-607**

**In the Matter of the Application of Minnesota Power for a Route Permit for a High Voltage Transmission Line for the HVDC Modernization Project in Hermantown, Saint Louis County
MPUC Docket No. E-015/TL-22-611**

Dear Judge Mortenson:

The Large Power Intervenors (“LPI”) submit this letter in response to Minnesota Power’s Motion to Take Notice filed in this matter on May 28, 2024. In its Motion, Minnesota Power requests the Administrative Law Judge (“ALJ”) take notice of new permitting legislation that, in Minnesota Power’s view, curtails the review of the American Transmission Company (“ATC’s”) Arrowhead Alternative in this proceeding.

Regardless of whether the ATC Alternative is considered, the ALJ and the Minnesota Public Utilities Commission (“Commission”) need to review issues “relating to project size, type and timing” of the proposed Project.¹ The Commission expressly found that these issues are relevant to the analysis of the need for the HVDC Modernization Project and therefore the Commission required record development of such topics.² The Commission noted that it would “address whether the project is ultimately necessary and whether to establish conditions on the project’s construction and operation in future proceedings.”³ LPI requests the ALJ develop a full record of the size, type and timing of the proposed HVDC Modernization Project for the Commission’s consideration in this matter.

¹ See Commission Order, August 8, 2023, p. 9.

² See Commission Order, August 8, 2023, p. 9.

³ See Commission Order, November 29, 2023, p. 4, n. 4.

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Thank you for the opportunity to submit this brief comment and LPI looks forward to receiving the ALJ Report and Recommendations.

By copy of this letter, all parties have been served. A Certificate of Service is also attached.

Sincerely,

Stoel Rives LLP

/s/ Amber S. Lee

Amber S. Lee

ASL:cal
Enclosures

cc: Service Lists

CERTIFICATE OF SERVICE

I, Carmel Laney, hereby certify that I have this day served a true and correct copy of the following document(s) 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.

LETTER IN RESPONSE TO MINNESOTA POWER'S MOTION TO TAKE NOTICE

SUBMITTED ON BEHALF OF THE LARGE POWER INTERVENORS ("LPI")

In the Matter of the Application of Minnesota
Power for a Certificate of Need for the
HVDC Modernization Project in
Hermantown, Saint Louis County
MPUC Docket No. E-015/CN-22-607

In the Matter of the Application of Minnesota
Power for a Route Permit for a High Voltage
Transmission Line for the HVDC
Modernization Project in Hermantown, Saint
Louis County
MPUC Docket No. E-015/TL-22-611

Dated this 18th day of June, 2024

/s/ Carmel Laney
Carmel Laney

[illegible]

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