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August 16, 2017

VIA E-FILING

Mr. Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place Street, Suite 350
St. Paul, MN 55101

**Re: In the Matter of Minnesota Power's Application for Approval of its 2015-2029
Resource Plan
PUC Docket Nos. E015/RP-15-690**

**In the Matter of Minnesota Power's Petition for Approval of the EnergyForward
Resource Package
PUC Docket No. E015/M/AI-17-568**

Dear Mr. Wolf:

Since the Large Power Intervenors ("LPI") filed its June 30, 2017, comment ("LPI Comment") objecting to Minnesota Power's two-pronged proposal to extend the deadline to file its next integrated resource plan ("IRP") and begin a contested case proceeding to review its EnergyForward proposal, Minnesota Power submitted a reply comment on July 12, 2017 (the "Reply Comment") and its Petition for Approval of the EnergyForward Resource Package (the "Petition"). Pursuant to the Minnesota Public Utilities Commission's (the "Commission's") August 3, 2017, notice, LPI is submitting this brief supplemental comment.

For at least three reasons, neither the Reply Comment nor the Petition justifies the relief Minnesota Power is seeking. First, the Commission should reject Minnesota Power's attempt to foist Commission approval of all or none of the resources identified in the Petition. Instead of complying with the clear and unambiguous July 18, 2016 order approving Minnesota Power's 2016-2030 IRP with modifications (the "Order"), Minnesota Power is seeking to combine review of solar and wind resources (which the Commission specifically approved in the Order) with a gas resource (which the Commission declined to approve in the Order). Second, it is unclear how Minnesota Power can be found in compliance with the Order, which specifically requires Minnesota Power's gas plant proposal to "include a *full analysis of all alternatives to natural gas*, including renewables, energy efficiency, distributed generation and *demand response*." Based on a cursory review of the Petition, it appears Minnesota Power failed to even reference

Mr. Daniel P. Wolf
August 16, 2017
Page 2

the thoughtful and detailed revisions to its Rider for Large Power Interruptible Service proposed by LPI in Minnesota Power's pending rate case, docket number E15/GR-16-664. And by focusing the review on wind, solar, and natural gas, Minnesota Power appears to have combined the review in a way that downplays the importance of the Order's specific directive to include a variety of alternatives to natural gas. Finally, and according to the Petition, the economics and design of Minnesota Power's proposed gas plant appear to still be in flux.

Therefore, LPI remains opposed to Minnesota Power's proposed process for reviewing the resources identified in the Petition. There is simply no rationale for the Commission to be forced into racing to approval of a gas plant and confusing the process by inappropriately conditioning essentially-already approved renewable resources on approval of the gas plant.

Very truly yours,

Stoel Rives LLP

/s/ Andrew P. Moratzka

Andrew P. Moratzka

APM:cal
Attachment

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 document 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.

SUPPLEMENTAL COMMENT ON BEHALF OF LARGE POWER INTERVENORS

In the Matter of Minnesota Power's Application for Approval of its 2015-2029 Resource Plan
Docket No. E015/RP-15-690

In the Matter of Minnesota Power's Petition for Approval of the Energy*Forward* Resource
Package
Docket No. E015/M/AI-17-568

Dated this 16th day of August, 2017.

/s/ Kathy Prestidge
Kathy Prestidge

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