



30 west superior street / duluth, minnesota 55802-2093 / fax: 218-723-3955 / www.allete.com

David R. Moeller
Senior Attorney
218-723-3963
dmoeller@allete.com

December 1, 2014

VIA ELECTRONIC FILING AND U.S. MAIL

The Honorable Ann O'Reilly
Office of Administrative Hearings
PO Box 64620
St. Paul, MN 55164-0620

Re: *In the Matter of the Request by Minnesota Power for a Certificate of Need for the Great Northern Transmission Line Project*
Public Comment – Government of Canada
MPUC Docket No. E015/CN-12-1163
OAH Docket No. 65-2500-31196

Dear Judge O'Reilly:

Please find enclosed to be included as a public comment in the above-referenced Docket, a letter from Canadian Ambassador Gary Doer to Environmental Protection Agency Administrator Gina McCarthy regarding the proposed rules for power plants in the United States. As part of the letter, Ambassador Doer specifically cites as an example of Canadian clean energy plans the recent long-term contract and proposed transmission line between Manitoba Hydro and Minnesota Power and the mutual benefits. This letter has been filed with the E-Docket system and served on the attached service list. Also enclosed is our Affidavit of Service.

Yours truly,

David R. Moeller
Senior Attorney
Minnesota Power

DRM:sr
Enc.



November 26, 2014

The Honorable Gina McCarthy
Administrator of the Environmental Protection Agency
William Jefferson Clinton Building,
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460

Dear Madam Administrator,

I am writing to you on behalf of the Government of Canada regarding the Existing Source Performance Standards (ESPS) for power plants proposed by the Environmental Protection Agency.

On October 28, EPA issued a supplemental proposed rulemaking which highlighted the binational implications of the proposed rule and solicited input on, “whether RE resources from Canada can be used to contribute to meeting a jurisdiction’s goal.” I firmly believe that imports of non-emitting electricity from Canada can be a tool for many states to reduce their dependency on high-GHG emitting electricity generation. Canada has an abundance of non-GHG emitting hydro-electric power making our electricity generation sector one of the cleanest in the world. As you may know, our government finalized stringent regulations in 2012 to reduce emissions from coal plants. Our regulations apply a performance standard that is based on the emissions level of an efficient natural gas power plant (926 lbs/MWh). Today, our coal fleet accounts for less than 10 percent of electricity generation and that proportion is expected to continue decreasing.

Furthermore, there is significant existing and proposed infrastructure that can bring additional clean Canadian power to the United States. There are currently seven transboundary transmission lines proposed that would provide additional clean energy for U.S. states to use in their implementation plans. One example of Canada-U.S. collaboration that will lead to reduced GHG emissions and exemplifies the integrated electricity grid is a recent long-term contract and proposed transmission line between Manitoba Hydro and Minnesota Power. This effort will shift the Minnesota power production profile away from coal and take advantage of the complementarity between Canadian renewable hydro and U.S. renewable wind power.

Various widely respected renewable energy credit tracking systems exist that ensure sound accounting of Canadian electricity imports. These systems can be built upon if the ESPS recognizes how states could make use of clean Canadian electricity as they develop their implementation plans. We have received feedback from U.S. states, utilities, and other stakeholders who would like to use Canadian renewable imports to comply with the Clean Power Plan. As you know, the North American Electric Reliability Corporation

works with utilities and regulators, including the Federal Energy Regulatory Commission, to assure the reliability of the bulk power system in North America. I ask that nothing in the final rule discourage cross-border collaboration that leads to cost-effective emissions reductions for the power sector, and that it fosters reliability and sustainability in our integrated grid.

I have also noted that the ESPS proposal acknowledges the continued role that fossil generation will play in the energy mix and the importance of carbon capture and sequestration (CCS) projects, like the Boundary Dam plant in Saskatchewan. Canada and the U.S. have collaborated extensively on CCS development and I hope that the final rule continues to encourage its use where appropriate.

I look forward to continuing the strong tradition we share of joint-stewardship of our environment, and I hope that these considerations will prove helpful to your regulatory efforts. Thank you for the opportunity to comment and the attention that you are giving to this important matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Gary Doer", with a stylized flourish at the end.

Gary Doer,
Ambassador

STATE OF MINNESOTA)
) ss
COUNTY OF ST. LOUIS)

AFFIDAVIT OF SERVICE VIA
ELECTRONIC FILING

Susan Romans of the City of Duluth, County of St. Louis, State of Minnesota, says that on the 1st day of December, 2014, she served Minnesota Power's Filing of the Comment of Ambassador Doer in Docket No. E015/CN-12-1163 to the Minnesota Public Utilities Commission and the Energy Resources Division of the Minnesota Department of Commerce via electronic filing. The remaining parties on the attached Official Service List were served as requested.



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Aafedt	daafedt@winthrop.com	Winthrop & Weinstine, P.A.	Suite 3500, 225 South Sixth Street Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_12-1163_Official cc Service List
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_12-1163_Official cc Service List
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	200 S 6th St Ste 4000 Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_12-1163_Official cc Service List
James	Denniston	james.r.denniston@xcenergy.com	Xcel Energy Services, Inc.	414 Nicollet Mall, Fifth Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_12-1163_Official cc Service List
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 500 Saint Paul, MN 551012198	Electronic Service	Yes	OFF_SL_12-1163_Official cc Service List
Burl W.	Haar	burl.haar@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_12-1163_Official cc Service List
Linda	Jensen	linda.s.jensen@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota Street St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_12-1163_Official cc Service List
Michael	Kaluzniak	mike.kaluzniak@state.mn.us	Public Utilities Commission	Suite 350 121 Seventh Place East St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_12-1163_Official cc Service List
Peter	Madsen	peter.madsen@ag.state.mn.us	Office of the Attorney General-DOC	Bremer Tower, Suite 1800 445 Minnesota Street St. Paul, Minnesota 55101	Electronic Service	Yes	OFF_SL_12-1163_Official cc Service List
Chad T	Marriott	ctmarriott@stoel.com	Stoel Rives LLP	900 SW 5th Ave Ste 2600 Portland, OR 97204	Electronic Service	No	OFF_SL_12-1163_Official cc Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_12-1163_Official cc Service List
Andrew	Moratzka	apmoratzka@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_12-1163_Official cc Service List
Ann	O'Reilly	ann.oreilly@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_12-1163_Official cc Service List
Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	OFF_SL_12-1163_Official cc Service List
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	Ste 122 9100 W Bloomington Frwy Bloomington, MN 55431	Electronic Service	No	OFF_SL_12-1163_Official cc Service List
Jennifer	Smestad	jsmestad@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_12-1163_Official cc Service List
Tracy	Smetana	tracy.smetana@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_12-1163_Official cc Service List
Mollie	Smith	msmith@fredlaw.com	Fredrikson Byron PA	Suite 4000 200 South Sixth Street Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_12-1163_Official cc Service List
Eric	Swanson	eswanson@winthrop.com	Winthrop Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_12-1163_Official cc Service List
Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine	225 South Sixth Street, Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_12-1163_Official cc Service List