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Samantha C. Norris
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November 18, 2014

Dr. Burl W. Haar, Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place East, Suite 350
St. Paul, MN 55101

RE: Interstate Power and Light Company and Southern Minnesota Energy Cooperative
Docket Nos. E001, E132, E114, E6521, E142, E135, E115, E140, E105, E139, E124,
E126, E145/PA-14-322
Revised Objection to Late Information Requests from Minnesota Chamber of
Commerce

Dear Dr. Haar:

Enclosed for e-filing with the Minnesota Public Utilities Commission, please find Interstate Power and Light Company and Southern Minnesota Energy Cooperative's Revised Objection to Late Information Requests from Minnesota Chamber of Commerce (the Chamber) in the above-referenced dockets.

The revision to the Objection is made to correct a typographical omission from page 4 of the original Objection. The revision is underscored for clarity.

Copies of this filing have been served on the Chamber, the Minnesota Department of Commerce, Division of Energy Resources, the Minnesota Office of Attorney General – Residential and Small Business Utilities Division, and the attached service list.

We apologize for any inconvenience.

Very truly yours,

/s/ Samantha C. Norris
Samantha C. Norris
Senior Attorney

SCN/kcb
Enclosures
cc: Service List

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STATE OF MINNESOTA

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

**Beverly Jones Heydinger
David C. Boyd
Nancy Lange
Dan Lipschultz
Betsy Wergin**

**Chair
Commissioner
Commissioner
Commissioner
Commissioner**

**IN THE MATTER OF A REQUEST FOR
APPROVAL OF THE ASSET
PURCHASE AND SALE AGREEMENT
BETWEEN INTERSTATE POWER
AND LIGHT COMPANY AND
SOUTHERN MINNESOTA ENERGY
COOPERATIVE**

**DOCKET NOS. E001, E132, E114,
E6521, E142, E135,
E115, E140, E105,
E139, E124, E126,
E145/PA-14-322**

**REVISED OBJECTION TO LATE INFORMATION REQUESTS FROM
MINNESOTA CHAMBER OF COMMERCE**

Interstate Power and Light Company (IPL) and Southern Minnesota Energy Cooperative (SMEC) (collectively Petitioners) hereby object to the 29 Information Requests (MCC-14 through MCC-42) submitted by the Minnesota Chamber of Commerce (the Chamber) on late Friday, November 14, 2014, which the Chamber claims should be answered on November 28, 2014 (the day after Thanksgiving).

As explained below, Petitioners object to these Information Requests (IRs) because the Chamber has not shown good cause for its decision to submit the IRs three months after the Commission's deadline for discovery. Specifically:

1. The Chamber's failure to act in a timely manner jeopardizes the ability of all parties to resolve this proceeding in a reasonable timeframe and increases the uncertainty faced by customers, employees and stakeholders;
2. These 29 IRs are unreasonably burdensome in volume and scope for such a late stage of this proceeding; and
3. There is no justification for the Chamber's failure to participate and complete discovery in this proceeding in a timely manner, which all other parties and members of the public were able to accomplish.

In the alternative, if further discovery by the Chamber is allowed, the burden on Petitioners and potential for delay should be relieved by:

1. Limiting the Chamber to no more than 10 of these IRs to be selected by the Chamber;
2. Setting December 2 as the due date for response to the Chamber IRs (10 business days after service, taking into account Thanksgiving and the following Friday); and
3. Allowing parties 14 days to respond to any new issues raised by the Chamber in its December 8 Comments (the date on which Reply Comments are due from all parties).

There are ample reasons to allow no further discovery by the Chamber and to allow all parties an opportunity to respond to the first statement of the Chamber's position which will be in its Reply to other Parties' Comments.

First, the Chamber has not provided good cause for its failure to issue IRs in a timely manner. The Commission's July 7, 2014 Notice of Informational Meeting and Extension of Comment Period required parties to submit IRs by August 7, 2014. The Chamber initially complied with the Commission's procedural schedule and issued 13 IRs to the Petitioners on July 8, 2014. The Petitioners responded on July 30, 2014. The Petitioners also responded to a number of informal questions from the Chamber beginning prior to the filing of the Petition and extending through the Informational Meetings on July 17 and 18.

Next, despite being provided with extensive information, the Chamber chose not to ask follow up IRs, nor did the Chamber participate in the development and narrowing of issues that occurred through three rounds of comments and the Commission's November 6, 2014 hearing. During this period, the Chamber had full access to all discovery responses, had ample opportunity to review the extensive information that has been filed in this case, and has had numerous opportunities to raise concerns and submit IRs.

Finally, the Chamber has provided no good cause for its failure to abide by the Commission's July 7, 2014 Notice of Informational Meeting and Extension of Comment Period. Despite the Petitioners' efforts to engage the Chamber early in the process, the extensive opportunities to participate that have been provided by the Commission, and the efforts of all parties to conduct this review expeditiously in order to limit the period of uncertainty for customers and other stakeholders, the Chamber unreasonably withheld this latest round of discovery until three months after the Commission's deadline. The Chamber has provided no good cause for its delay, which is required under Minn. Rule 7829.3100. Further, the Commission's Notice of Extended Comment Period allowed an extension for comments until December 8, 2014 but did not allow any further discovery. Accordingly, the Petitioners should have no obligation to respond to the Chamber's latest round of discovery

The chronology of extensive meetings, presentation of information, discovery, and comments by Parties and customers in this proceeding is as follows:

- February: Telephone contacts between Petitioners and Chamber
- March 4: Meeting between Chamber and Petitioners to discuss rate impacts on commercial and industrial customers and discuss the SMEC and SMEC Member Cooperative rate proposal
- April 15: Petition filed
- April 22: Chamber added to service list for this docket
- April 28: Notice sent to IPL customers, including Chamber members
- May 13: Webinar held for commercial and industrial customers, including Chamber members
- June 30: Commission issues Order Requiring Additional Record Development, including cut-off for discovery and comments
- July 7: Notice of Informational Meeting and August 7 cutoff for discovery to Petitioners,
- July 8: 13 Information Requests sent by Chamber
- July 17 and 18: Informational meeting held pursuant to June 30 Order; Chamber representatives present at both days of meeting
- July 30: Petitioners respond to Chamber IRs
- August-September: Public comments provided by cities, local Chambers of Commerce and individuals
- August 7: IRs sent by OAG
- August 11: Notice of opportunity to file Comments
- September 2: Petitioners file answers to IRs from Department, OAG, and MMUA, including extensive rate impact information by customer classes (e-served on Chamber)
- September 6: Responsive Comments filed by Petitioners
- September 8: Small number (6) of additional IRs sent by Department (All related to September 4 Reply Comments)
- September 9: Small number (2) additional IRs sent by OAG [(Related to DOC-57, submitted by Petitioners)
- September 17: Petitioners respond to additional IRs from OAG
- September 22: One additional IRs sent by OAG (Related to DOC-57),
- September 23: Petitioners respond to additional Department IRs
- October 6: Department, OAG and MMUA file Reply Comments
- October 10: Notice of Additional Comment Period (Initial Comments due November 10; Reply Comments due November 24)
- November 6: Commission hearing regarding public meetings, including discussion of the record and outreach by Petitioners.
- November 10: Initial Comments filed by Petitioners, Department, and OAG
- November 14: 29 IRs filed by Chamber

If the Commission concludes the Chamber's latest round of IRs should be answered, the Petitioners request the following modifications:

- Scope: The parties have worked to develop and narrow the issues in this case. To ensure the Chamber's late discovery does not prevent this proceeding from reasonably moving toward completion, the Chamber should be limited to submitting 10 questions (including subparts).
- Schedule: Given the lateness of the Chamber's IRs and the pending Thanksgiving holiday, Petitioners request they be given 10 business days to respond to the Chamber IRs (not counting Thanksgiving or Friday, November 28). Petitioners also request the Commission clarify the Chamber may not issue additional discovery after November 19, 2014.
- Opportunity for Response to Chamber. Only two of the Chamber's IRs appear to be related to previous Chamber discovery. Further, the Chamber has not submitted its position on any issues in this proceeding to date. Both of these facts indicate that the Chamber may attempt to raise new issues or arguments in its December 8 Comments. Accordingly, Petitioners (and other parties) should be allowed to file responsive comments. The Petitioners request such responsive comments be due on or before December 22.

Dated: November 18, 2014.

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