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June 26, 2014

VIA E-FILING AND U.S. MAIL

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

Re: *In the Matter of the Investigation into Environmental and Socioeconomic Costs Under Minn. Stat. 216B.2422, subd. 3*
MPUC Docket No. E-999/CI-00-1636

Dear Dr. Haar:

Pursuant to the Minnesota Public Utilities Commission's ("Commission") June 16, 2014 Notice of Comment Period in the above-captioned docket, the Lignite Energy Council submits these comments responding to the June 10, 2014 Comments of the Minnesota Department of Commerce and the Minnesota Pollution Control Agency ("Comments"). As discussed below, the Lignite Energy Council notes that the Department of Commerce and Pollution Control Agency (collectively, "Agencies") "Comments" go well beyond the charge given to the Agencies by the Commission and cannot be adopted by the Commission consistent with all parties' due process rights.

As the Agencies' own Comments recognized, "The Commission's order explicitly stated that the geographic scope of the application of the externality value for CO₂ (i.e. the previous Commission decision to not apply a CO₂ externality value outside of Minnesota) would not be reevaluated at this time." (Comments, page 4). However, the agencies then defied this specific direction and recommended that "all damages [for criteria pollutant emissions] should be considered, not just those within Minnesota." (Comments, page 5). The Lignite Energy Council supports the June 25, 2014 Comments of the State of North Dakota requesting that the Commission reaffirm its decision to leave in place the current geographical limitations regarding the application of any environmental cost values ultimately adopted in this proceeding.

Furthermore, in its February 10, 2014 Order Reopening Investigation And Convening Stakeholder Group To Provide Recommendations For Contested Case Proceeding ("Order") in this matter, the Commission gave clear direction to the Agencies, stating at page 3 of the Order:

The Commission will request that the Department and the Pollution Control Agency convene a stakeholder group to provide further recommendations on the scope of the investigation, and on whether the Commission should engage an expert authorized by Minn. Stat. § 216B.62, subd. 8,

and if so, what role such an expert would play. The Commission will require the stakeholder group to provide its recommendations four months from the date of this order.

In its Ordering paragraphs, the Commission similarly ordered:

Four months from the date of this order the Commission requests that the Department and the Pollution Control Agency report the stakeholder group's conclusions to the Commission.

As the Agencies note in their June 10 Comments, “there was little consensus arising out of the stakeholder meeting or in subsequent written comments,” with consensus reached only on a few overarching principles such as the need for transparency in any analysis used in this proceeding. (Comments, page 3). Indeed, during the single stakeholder meeting held, no meaningful consensus was reached on any of the most contentious issues. Nonetheless, the Agencies go on in their Report to now make their own recommendations on highly disputed items. Most notably, the Agencies now recommend that the Commission short-circuit the contested case hearing process and simply “adopt” the federal social cost of carbon figure as its CO2 value. The federal social cost of carbon itself has been subject to debate and was never designed to be a state specific resource planning input for utilities to use in evaluating and selecting resource options.

Certainly, as this case moves forward the Agencies can provide expert testimony and analysis as to why they believe this value is appropriate, if they continue to hold that belief as more evidence comes forward. However, it is difficult to imagine a more controversial and highly contested item than the “environmental cost” of carbon dioxide. To ignore this controversy and instead mandate a new cost of CO2 tramples the parties’ due process rights.

In addition, the Agencies attempt to preempt a full discussion of analytical options available to develop values, by recommending that the Commission order parties to “apply [a] photochemical modeling process to estimate air quality impacts of electric power plant emissions, followed by health impact modeling and economic valuation.” On this issue, as with the cost of carbon issue, the Commission should allow the record to develop and allow parties to present their cases without pre-judging the issues.

In conclusion, the Lignite Energy Council respectfully requests that the Commission re-affirm its prior decision to maintain the current geographical limitation regarding the application of environmental cost values. In addition, given the lack of consensus among the parties in the stakeholder meeting, the Commission should refer the remaining issues (developing new environmental cost values for CO2, SO2, NOx and PM 2.5) to the Office of Administrative Hearings for contested case proceedings.

Sincerely,

LIGNITE ENERGY COUNCIL

A handwritten signature in black ink that reads "Jason Bohrer". The signature is written in a cursive style with a long horizontal flourish at the end.

Jason Bohrer
President & CEO

Cc: Attached Service List

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION
121 Seventh Place East, Suite 350
St. Paul, Minnesota 55101-2147

In the Matter of the Investigation into
Environmental and Socioeconomic Costs Under
Minn. Stat. 216B.2422, subd. 3

MPUC Docket No. E-999/CI-00-1636

AFFIDAVIT OF SERVICE

STATE OF MINNESOTA)
) ss.
COUNTY OF HENNEPIN)

Mary G. Holly, of the City of Lake Elmo, County of Washington, the State of Minnesota, being first duly sworn, deposes and says that on the 26th day of June, 2014, she served the attached **Comments** to all said persons on the attached Service List, true and correct copies thereof, by E-Filing and/or by depositing the same enclosed in an envelope, postage prepaid in the United States Mail in the post office at Minneapolis, Minnesota.

/s/ Mary G. Holly
MARY G. HOLLY

Subscribed and sworn to before me this
26th day of June, 2014.

/s/ Jane E. Justice
Notary Public

My Commission Expires: January 31, 2015

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