

**In the Matter of the Petition to Transfer a portion of the Route Permit for the HVDC
Transmission Line System and Associated Facilities in Minnesota**

Reply Comments

PUC Docket Number: ET2/TL-21-434

LIUNA Minnesota & North Dakota appreciates the opportunity to offer reply comments in support of the petition by Nexus for Commission approval of their request to replace the letter of credit with the financial guaranty. We apologize for the late submission. We agree with the applicant that, “REMC has the financial wherewithal to perform under the guaranty in the unlikely circumstance that Nexus cannot fulfill its obligations to decommission the HVDC line, and the form of guaranty is reasonable and commonly-accepted.”¹

The Commission’s current process for managing site permits, transfers and decommissioning has not left the landscape littered with poorly-maintained or abandoned power lines and turbines. Instead, it has facilitated robust clean energy development that has generated thousands of jobs and many millions of dollars in local revenues, while delivering clean and low-cost power to customers. These substantial benefits could be jeopardized, however, by a decision to begin ratcheting up requirements for owners to fully pre-fund decommissioning, deliver parental guarantees or otherwise provide costly financial assurance. Such requirements would simply raise power prices and undermine the state’s ability to compete for clean energy investment while benefiting banks and other companies that sell financial instruments.

Information filed by Nexus shows that the HVDC is in excellent condition. There is simply no basis in the record for treating the line as a “risky” asset for purposes of decommissioning assurance. We urge the Commission to approve Nexus’ request to replace the letter of credit with the financial guaranty.

Dated: August 11, 2023

Respectfully Submitted,
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¹ Nexus Reply Comments, August 10, 2023, pg. 2.