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December 5, 2013

VIA ELECTRONIC FILING

Dr. Burl W. Haar
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2417

Re: In the Matter of Minnesota Power's Boswell Energy Center Unit 4
Environmental Retrofit Project - Mercury Emission Reduction Plan Petition
Docket No. E015/M-12-920

Dear Dr. Haar:

Minnesota Power hereby electronically submits its Response to the Request for Reconsideration in the above-referenced Docket. An Affidavit of Service is included.

Please contact me at the number above in you have any questions regarding this submission.

Yours truly,

David R. Moeller

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c: Service list

**STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION**

In the Matter of Minnesota Power’s
Boswell Energy Center Unit 4
Environmental Retrofit Project
And Boswell 4 Environmental
Improvement Rider

Docket No. E015/M-12-920

**MINNESOTA POWER’S ANSWER TO
MINNESOTA CENTER FOR
ENVIRONMENTAL ADVOCACY
REQUEST FOR RECONSIDERATION**

Minnesota Power respectfully requests that the Minnesota Public Utilities Commission (“Commission”) deny the Request for Reconsideration of Izaak Walton League of America – Midwest Office, Fresh Energy, Sierra Club and Minnesota Center for Environmental Advocacy (collectively “Petitioners”) pertaining to the Commission’s November 5, 2013 order (“Order”) in this matter. Petitioners’ request fails to establish any legal error in the Commission’s decision and it neither raises new issues or facts, nor warrants additional consideration.

On November 5, 2013 the Commission entered its Order in the above-referenced Docket under the Minnesota Mercury Emissions Reduction Act of 2006 (“Mercury Act”). On November 25, 2013, Petitioners served their Request for Reconsideration (“Request”) requesting that the Commission reconsider/vacate the Order. For reasons stated below, Minnesota Power asserts that the Commission should deny the Request on its merits.

Petitioners rely almost exclusively on the assertion that Minnesota Pollution Control Agency (“MPCA”) issued a report (“MPCA Report”) that did not analyze Minnesota Power’s resource planning analysis included as an appendix to its August 31, 2012 Petition for Approval of its Boswell Energy Center Unit 4 Environmental Retrofit Project and Boswell Unit 4 Environmental Improvement Plan (“Boswell 4 Petition”). Petitioners claim that MPCA’s alleged failure violated Minn. Stat. § 216B.684 and therefore the Commission’s acceptance of the MPCA Report violated Minn. Stat. § 216B.6851, subd. 6. However, Petitioners’ assertion is based on a faulty reading of the Mercury Act.

The two statutes in question address consideration of “mercury” reduction plans. As the Request cites on page 6, Minn. Stat. § 216B.684 instructs the MPCA to “evaluate a utility’s **mercury-emission reduction plans** filed under sections 216B.682 and 216B.6851...” (emphasis added). Minnesota Power submitted its mercury-emission reduction plan for Boswell Unit 4 under Minn. Stat. § 216B.6851, subd. 3 and an alternative plan under Minn. Stat. § 216B.6851, subd. 4. These plans were, in fact, considered by the MPCA in its report and were properly addressed by the Commission in its Order.

Contrary to the Petitioners’ claims, Minnesota Power’s alternative mercury-emissions reduction plan was not a natural gas resource alternative, but consistent with the Mercury Act, a plan “designed to come as near as technically possible to achieving the goal established under subdivision 3 without imposing excessive costs on the utility’s customers.” Simply put, this was an alternative technology plan that could achieve less than the 90 percent mercury reduction goal the Legislature established for utilities subject to the Mercury Act by not fully utilizing the same retrofit technology. This alternative mercury-emission reduction plan is also consistent with what the Commission reviewed and approved for Minnesota Power’s Boswell Unit 3 after the MPCA’s analysis of “alternative systems”.¹

The Commission’s consideration of two natural gas replacement options for Boswell Unit 4 was in accordance with its general evaluation under the Integrated Resource Plan statute, including general considerations under the Mercury Act and other environmental statutes, as well as the overall impact on Minnesota Power’s ratepayers. In fact, the Commission specifically considered Minnesota Power’s 2013 Integrated Resource Plan at the same agenda hearing on September 25, 2013 to allow a full discussion on Boswell Unit 4. The Commission’s evaluation of the mercury reduction plan for Boswell Unit 4 was not limited to the MPCA’s technical feasibility of emission reduction technologies,² but properly included Minnesota Power’s

¹ See Order dated October 26, 2007 in Docket No. E015/M-06-1501. The Commission summarized the MPCA’s review of the Boswell Unit 3 mercury-emissions reduction plan as follows: “Minn. Stat. § 216B.684 requires the Minnesota Pollution Control Agency to evaluate a mercury emissions reduction plan filed under both Minn. Stat. § 216B.682 and the statute under which MP filed, Minn. Stat. § 216B.6851. MPCA’s review of MP’s Boswell 3 filing concluded that 1) MP’s plan meets the requirements of Minn. Stat. §§ 216B.682, 216B.686, subd 1, and 216B.6851; 2) MP’s plan for reducing mercury, NOx, particulate matter and SO2 emissions at Boswell 3 is appropriate; 3) MP’s plan is cost effective, and will result in a lower cost per pound of mercury emissions reduction than **the costs estimated for alternative systems**; and 4) the health benefits of MP’s proposed multi-pollution reduction plan are likely to exceed its costs.” (emphasis added).

² See *In Re Northern States Power*, 775 N.W.2d 652, 657 (Minn. Ct. App. 2009) (“Once an appropriate plan has

resource planning sensitivity analysis and findings “that the proposed retrofit tended to cost less than the replacement options under a variety of future conditions.” Order at 6. Those resource planning alternatives did not become part of the mercury reduction plan and it was appropriate for MPCA not to consider them.

In the end, the MPCA did exactly what it was directed to do, which is to evaluate the mercury controls that are to be placed on an existing plant to determine whether it will meet compliance standards in accordance with the Mercury Act. The Department also evaluated the overall costs of the project and sensitivities around it. The Commission also reviewed the Department’s conclusion that replacing Boswell Unit 4 “is not a cost-effective option.” In addition, Commission Staff submitted multiple information requests to Minnesota Power on natural gas options and the Commission sought additional comments on Minnesota Power’s responses. Petitioners’ Request would merely proliferate calls to hypothesize and run other scenarios well beyond what the statute actually requires. Based on the record in this case, that is not warranted. Based on this record, the Commission correctly concluded “that further analysis of natural gas options is not warranted at this time.” Order at 6.

Under the applicable standard, the Commission’s decision will be upheld unless the substantial rights of the petitioners have been prejudiced. Minn. Stat. § 14.69(d). In reviewing agency decisions, courts adhere to “the fundamental concept” that decisions of administrative agencies enjoy a “presumption of correctness” and that courts afford deference to the agencies’ expertise and their special knowledge in the field of their training, education, and experience.³ Accordingly, when an agency is statutorily mandated to consider certain factors in making a decision, a reviewing court must defer to the agency’s decision so long as those factors were considered as part of the agency’s decision.⁴ Judicial deference is also “extended to an

been submitted and recommended for approval by MPCA, MPUC’s authority to approve a plan is clear and limited. MPUC shall review and evaluate each plan submitted, **based on several factors.**”) (emphasis added).

³ *In re Universal Underwriters Life Ins. Co.*, 685 N.W.2d 44, 45 (Minn. Ct. App. 2004) (quoting *In re Excess Surplus Status of Blue Cross and Blue Shield of Minn.*, 624 N.W.2d 264, 277-78 (Minn. 2001)).

⁴ *See In re Great River Energy*, Nos. A09-1646, A09-1652, 2010 WL 2266138, at *6 (unpublished Minn. Ct. App. Jun. 8, 2010) (“Because MPUC considered the impact that CapX2020 would have on wildlife and fish refugees [as required by statute], we must defer to its decision.”).

agency decision-maker in the interpretation of statutes that the agency is charged with administering and enforcing.”⁵

Notably, two of the cases relied upon by Petitioners actually support the Commission’s decision in this Docket and contradict the Request.⁶ The *Universal Life* case stands for the unremarkable proposition that the Courts will provide deference to an agency when applying its enabling statute. The court rejected the claim that the agency “failed to consider all the statutory factors” in making its decision and found that the agency had properly administered its statute.⁷ Even more importantly, in the *Handle with Care* case, the Minnesota Supreme Court specifically rejected the claim that the statutory language in that case created the type of pre-condition to agency action that Petitioners are claiming here.⁸ These cases and the other authorities cited by Petitioners fail to support their attempt to impose extra requirements on the Commission.

The Commission has repeatedly denied petitions for reconsideration where the petitioner has not demonstrated the Commission’s decision was incorrect. For example, in a 1991 service territory dispute, the Commission stated:

The Commission finds that the City’s petition raises no new issues, offers no new evidence, and identifies no issues requiring further consideration. The petition restates the City’s original arguments, which the Commission has duly reexamined and continues to reject for the reasons set forth in the March 15 Order.⁹

Likewise, Petitioners raise no new issues, offer no new evidence and merely restate or incorporate arguments before the Commission.¹⁰ “When reviewing agency decisions [the court] adhere[s] to the fundamental concept that decisions of administrative agencies enjoy a

⁵ *Id.*

⁶ See Request, p. 8, fn 4, citing *Handle With Care, Inc. v. Department Of Human Services*, 406 N.W.2d 518, 523 (Minn. 1987) and *In the Matter of Universal Underwriters Life Ins. Co.*, 685 N.W.2d 44, 46 (Minn. Ct. App. 2004).

⁷ 685 N.W.2d at 46-47.

⁸ 406 N.W.2d at 523 (finding that statutory requirement to prepare report was not a precondition to rulemaking).

⁹ *In the Matter of a Petition by the City of Rochester, Minnesota, for an Order Establishing Petitioner’s Right to Provide Electric Service to Certain Street Lights Constructed and Owned by Petitioner and Located in the City of Rochester Adjacent to Highway 63 North, in the Service Territory of People’s Cooperative Power Association*, Docket No. E-132, 299/SA-90-1077, Order dated April 19, 1991.

¹⁰ Petitioners’ Request includes an unsubstantiated Statement by Dr. Ranajit Sahu that includes analysis and evidence that is not part of the record despite the Commission noticing two rounds of comments. This extra-record material is of no probative value and does not contradict the correctness of the Commission’s Order.

presumption of correctness, and deference should be shown by courts to the agencies' expertise and their special knowledge in the field of their technical training, education, and experience." *In re Universal Underwriters Life Ins. Co.*, 685 N.W.2d 44, 45-46 (Minn. Ct. App. 2004) (quoting *In re Excess Surplus Status of Blue Cross and Blue Shield of Minn.*, 624 N.W.2d 264, 277-78 (Minn. 2001)). "We have recognized that decisions of administrative agencies 'enjoy a presumption of correctness, and deference should be shown by courts to the agencies' expertise and their special knowledge in the field of their technical training, education, and experience.'" *In re Application of Minn. Power for Authority to Increase Rates for Elec. Serv. in Minn.*, 838 N.W.2d 747, 757 (Minn. 2013) (quoting *Reserve Mining Co. v. Herbst*, 256 N.W.2d 808, 824 (Minn. 1977)).

Finally, the Request asserts that the Commission merely rubberstamped the MPCA's Report, citing *Johnson v. Commissioner of Health*, 671 N.W.2d 921 (Minn. Ct. App. 2003). That case is distinguishable from the present case. In *Johnson*, the Court of Appeals concluded that reversal of an agency decision was warranted where there were no written findings or reasons given, and the agency provided only a conclusory explanation of the application of three of the eight statutorily mandated factors for the agency to consider. *Id.* at 924. Here, in contrast, the Commission provided a written order considering all the applicable factors under the Mercury Act, including factors that were beyond the MPCA Report. See *In re 401 Water Quality Certification*, 822 N.W.2d 676, 685 (Minn. Ct. App. 2012) (holding there was no error of law where the MPCA complied with the various requirements of federal and state law).

As the Commission found for SMMPA's request for reconsideration under the Mercury Act in Docket No. E002/M-07-601, Petitioners' Request "does not raise new issues, does not point to new and relevant evidence, does not expose errors or ambiguities in the original Orders, and does not otherwise persuade the Commission that it should rethink its original decision."

Minnesota Power's Boswell 4 Petition met all applicable requirements. The MPCA did exactly what was required of the agency under the Mercury Act and the Commission made a decision with a fully developed record. The Petitioners' Request fails to establish any legal error in the Commission's Order and it neither raises new issues or facts, nor warrants additional consideration. Minnesota Power respectfully requests that the Commission deny Petitioners' Request for Reconsideration.

Dated: December 5, 2013

Respectfully submitted,

A handwritten signature in black ink that reads "David R. Moeller". The signature is written in a cursive style with a large, prominent 'D' and 'M'.

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STATE OF MINNESOTA)
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AFFIDAVIT OF SERVICE VIA
ELECTRONIC FILING

Kristie Lindstrom of the City of Duluth, County of St. Louis, State of Minnesota, says that on the 5th day of December, 2013, she served Minnesota Power’s Reply Comments on Request for Reconsideration in Docket No. E015/M-12-920 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 service list were served as so indicated on the list.

/s/ Kristie Lindstrom

Subscribed and sworn to before
me this 5th day December, 2013.

/s/ Melody K. K. Sawyer

Notary Public - Minnesota
My Commission Expires Jan. 31, 2018

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