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Dr. Burl W. Haar
Public Utilities Commission
121 7th Place East, Suite 350
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**Re: In the Matter of Minnesota Power's Petition for Approval of the Rider
for Boswell Energy Center Unit 4 Emission Reduction
Docket No. E015/M-12-920**

Dear Dr. Haar:

Attached please find the Large Power Intervenors' Answer to Request for Reconsideration.

If you have any questions, please contact me.

Very truly yours,

STOEL RIVES LLP

/s/ Andrew P. Moratka

Andrew P. Moratzka

APM/mrl

Enclosure

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

121 7th Place East, Suite 350
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In the Matter of Minnesota Power’s Petition
for Approval of the Rider for Boswell Energy
Center Unit 4 Emission Reduction

PUC Docket No. E015/M-12-920

**ANSWER TO REQUEST FOR
RECONSIDERATION**

The following companies submit this comment in the above-captioned docket collectively as a party known as the Large Power Intervenors (“LPI”): ArcelorMittal USA (Minorca Mine); Boise, Inc.; Enbridge Energy, Limited Partnership; Hibbing Taconite Company; Mesabi Nugget Delaware, LLC; NewPage Corporation; PolyMet Mining, Inc.; Sappi Cloquet, LLC; UPM – Blandin Paper Company; USG Interiors, LLC; United States Steel Corporation (Keewatin Taconite and Minntac Mine); and United Taconite, LLC.

I. INTRODUCTION

On November 5, 2013, the Commission issued its Order approving the Boswell 4 Mercury Reduction Plan (“BEC4 Mercury Reduction Plan”) and cost recovery for the associated costs (“Approval Order”). On November 25, 2013, the Environmental Intervenors filed a Request for Reconsideration of the Commission’s Order (“Request for Reconsideration”).

The Environmental Intervenors request reconsideration of the Approval Order under Minn. Stat. §216B.27 and Minn. R. 7829.3000. Under §216B.27, the Environmental Intervenors must set forth the specific grounds on which it contends the decision is unlawful or unreasonable.¹ Similarly Minnesota Rules 7829.3000 provide that a petitioner must set forth the grounds relied upon or errors claimed.² For its part, the Commission often looks for new issues raised, new evidence introduced, and errors or ambiguities exposed in the order.³

¹ Minn. Stat. §216B.27, subd. 2.

² Minn. R. §7829.2000, subp. 2.

³ See e.g., *In the Matter of the Petition of Northern States Power Company d/b/a Xcel Energy for Approval of*

The Environmental Intervenors claim the Approval Order is unlawful because it violates Minn. Stat. §216B.6851, subd. 6 which requires that the Commission consider “the environmental and public health benefits, the agency’s determination of technical feasibility, competitiveness of customer rates, and cost-effectiveness of the utility’s proposed mercury control initiatives in light of the Pollution Control Agency’s review under paragraph (a).” The Environmental Intervenors claim the Minnesota Pollution Control Agency’s (“MPCA”) review as required under Minn. Stat. §216B.684⁴ was deficient for failure to provide a detailed assessment of the environmental and public health benefits of alternatives to the BEC4 Mercury Reduction Plan such as repowering with natural gas. Because the MPCA review was deficient, the Environmental Intervenors argue, the Commission cannot legally approve the plan.⁵

For the reasons described in greater detail below, LPI believes the request should be denied. Although the Environmental Intervenors argue that the Approval Order is unlawful, they raise no new issues or legal arguments to make this case other than what was exhaustively reviewed by the Commission in this docket and in making its decision in the Approval Order. Because the Commission’s decision in that Approval Order is consistent with the facts, the law and the public interest, it should not be reconsidered. Furthermore additional delays, which would postpone the environmental and public health benefits while increasing cost of the project, are contrary to the public interest.

Competitive Resource Acquisition Proposal and Certificate of Need, Docket No. E002/CN-12-1240, ORDER DENYING RECONSIDERATION (Aug. 5, 2013) (“Based on this review, the Commission finds that the petition does not raise new issues, does not point to new and relevant evidence, does not expose errors or ambiguities in the June 21 order, and does not otherwise persuade the Commission that it should rethink the decisions set forth in that order. The Commission concludes that the decision is consistent with the facts, the law, and the public interest and will therefore deny the request for reconsideration.”).

⁴ “The Pollution Control Agency shall evaluate a *utility’s mercury emissions-reduction plans* filed under sections 216B.682 and 216B.6851 and submit its evaluation to the Public Utilities Commission within 180 days of the date the plan is filed with the agency and commission. In its review, the agency shall (1) assess whether the utility’s plan meets the requirements of section 216B.682 or 216B.6851, as applicable, (2) evaluate the environmental and public health benefits of each option proposed or considered by the utility, including benefits associated with reductions in pollutants other than mercury, (3) assess the technical feasibility and cost-effectiveness of technologies proposed or considered by the utility for achieving mercury emissions reduction, and (4) advise the commission of the appropriateness of the utility’s plan. In preparing its assessment, the agency may request additional information from the utility, especially with regard to alternative technologies or configurations applicable to the specific unit, and the estimated costs of those alternatives.” (emphasis added).

⁵ *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, REQUEST FOR RECONSIDERATION BY THE IZAAK WALTON LEAGUE OF AMERICA - MIDWEST OFFICE, FRESH ENERGY, SIERRA CLUB, AND MINNESOTA CENTER FOR ENVIRONMENTAL ADVOCACY (Nov. 25, 2013), at 3 (“Request for Reconsideration”).

II. ANALYSIS

A. **The Record Fully Supports the Commission’s Determination that Minnesota Power, the Department and the MPCA all Complied with the Statutory Requirements.**

The Environmental Intervenors essential argument for reconsideration is based on a flawed interpretation of the Mercury Emission Reduction Act (“MERA”). Specifically they argue that the MPCA’s analysis of the BEC4 Mercury Reduction Plan was legally deficient. In so doing, the Environmental Intervenors conflate what is required to be included in the utility’s mercury reduction plan under section 216B.6851, subd. 3 and MPCA’s review of that plan under section 216B.684 with the utility’s analysis of alternatives to that plan under section 216B.6851, subd. 4 and the utility’s separate reporting requirements under section 216B.6851, subd. 5. Notably, subdivision 5 directs the utility to provide analysis of potential retrofit or repowering options in annual filings and consult with the Department. It does not direct MPCA to review wholesale alternatives to the utility’s mercury reduction plan as part of its review under §216B.684. Instead the MPCA must “evaluate a utility’s mercury emissions-reduction plans, “assess whether it meets the statutory requirements,” and:

evaluate the environmental and public health benefits of each option proposed or considered by the utility, including benefits associated with reductions in pollutants other than mercury, (3) assess the technical feasibility and cost-effectiveness of technologies proposed or considered by the utility for achieving mercury emissions reduction, and (4) advise the commission of the appropriateness of the utility's plan.⁶

The Approval Order follows the statutes closely adhering to this distinction, addresses the Environmental Intervenors assertion that MPCA had not fulfilled its obligations, and then proceeds to instead focused on the statutorily obligated parties’ fulfillment thereof. The Approval Order outlines in detail the statutory requirements under MERA and pays particular attention to Minn. Stat. § 216B.684 governing the MPCA’s review of the utility’s mercury reduction plan. In approving the BEC4 Mercury Reduction Plan, the Commission carefully followed the direction set forth by the legislature in Minn. Stat. § 216B.6851, subd. 6 and then went on to separately and directly address the argument that the Environmental Intervenors make once again:

The Environmental Intervenors also argued that Minnesota Power and the MPCA did not give adequate consideration to natural gas

⁶ MINN. STAT. §216B.684.

replacement alternatives. However, Minnesota Power considered two natural gas replacement options: (1) building a new natural gas facility and (2) acquiring an ownership share in a larger natural gas facility. Minnesota Power conducted a sensitivity analysis and found that the proposed retrofit tended to cost less than the replacement options under a variety of future conditions. The Department agreed that retiring Boswell 4 is not a cost-effective option. The Commission concludes that further analysis of natural gas options is not warranted at this time.⁷

Notably the Commission's analysis of whether plan alternatives were adequately evaluated was kept somewhat separate from its decision to approve the BEC4 Mercury Reduction Plan. Further, the Commission found that the MPCA had fulfilled its role in assessing the plan and different technology options associated with the plan, and that alternatives to the whole plan (e.g. retiring the Boswell Unit 4 and replacing it with a natural gas plant) had been sufficiently analyzed by Minnesota Power and the Department.

LPI suspects that the Commission was careful to get the treatment of the different statutory obligations right in its Approval Order because these very questions of statutory interpretation and obligations had been exhaustively discussed on the record in this docket. Counsel for the Environmental Intervenors, for example, spent considerable time during the September 25, 2013, hearing making these arguments as to the statutory insufficiency of either Minnesota Power's Petition or MPCA's review thereof⁸ and the Commissioners and other Parties spent considerable time and attention responding to them. For its part, LPI responded to this very statutory interpretation question in its Supplemental Reply Comment.⁹ The Environmental Intervenors persist in raising a flawed legal argument for reconsideration that has been directly and adequately addressed in the record. Contrary to the assertions by the Environmental Intervenors, the MPCA's analysis was sufficient under MERA and the Commission's reliance thereon and Approval Order is consistent with Minnesota law.

Not only have all parties fulfilled their statutory obligations under MERA, each focused attention on what it was best equipped to do. The MPCA carefully reviewed the technical feasibility and environmental and public health benefits of each technology option to reduce

⁷ Approval Order at 6.

⁸ See e.g. Oral Argument Transcript, Goodpaster, September 25, 2013 at P42:1-25; P43:1-25; P44:1-25; P45:1-25; 46:1-5.

⁹ *In the Matter of Minnesota Power's Boswell Energy Center Unit 4 Environmental Retrofit Project*, Docket No: E-015/M-12-920, SUPPLEMENTAL REPLY COMMENT (AUG. 19, 2013).

mercury at the unit as proposed under the BEC4 Mercury Reduction Plan. But the MPCA largely left the alternative plan questions and their associated impacts on rates and reliability to the utility, the Department and the Commission.¹⁰ Minnesota Power has carefully weighed alternative plans over considerable time¹¹ for BEC4 in light of its unique load profile¹² and the reliability and economic challenges it creates.¹³ The Department determined the BEC4 Mercury Reduction Plan was a cost-effective way of meeting the federal MATS and Minnesota mercury requirements,¹⁴ but also determined that retiring BEC4 would not be cost-effective under any scenario or contingency.¹⁵ It also considered various retirement or repowering options for Boswell 4 in light of Minnesota Power's entire fleet.¹⁶

B. Further Delays Could be Costly and are not in the Public Interest.

Additional and unwarranted analysis will result in further delays, which will postpone the environmental and public health benefits of the BEC4 Project and could further exacerbate the already escalating costs of delay. The roughly 2.5 month delay imposed primarily by the petition for an Environmental Assessment Worksheet already increased costs due to a compressed

¹⁰ Staff Briefing Papers at 19 (“The MPCA stated that because it is the Department and Commission’s responsibility to determine whether a utility’s rates are excessive, the MPCA reviews capital and operating cost estimates to determine whether they are appropriately estimated. It requested that the DOC address question of appropriate electricity rates to recover the cost of the project”); See also Transcript of Oral Arguments, September 25, 2013, Frank Kohlasch. at P73:18-20; See also *In the Matter of Minnesota Power’s Boswell Energy Center Unit 4 Environmental Retrofit Project*, Docket No: E-015/M-12-920, COMMENTS ON MINNESOTA POWER’S JULY 3, 2013 RESPONSE TO STAFF INFORMATION Requests (Aug. 9, 2013).

¹¹ *In re Minnesota Power’s Baseload Diversification Study*, Docket No. E015/RP-09-1088, PUBLIC COMMENT OF THE DEPARTMENT OF COMMERCE, (May 7, 2013) ,p23 (“MP’s Baseload Study indicates that retiring Boswell 4, regardless of the level of EPA regulation, would result in substantial costs to MP’s ratepayers.”).

¹², September 25, 2013 at P8:24-25; P9:1-3; P7:17-20.

¹³ *Id.* at P8:14-17; P14:12-17; P24:18-19.

¹⁴ Oral Argument Transcript, Pierce, September 25, 2013 at P56:19-22.

¹⁵ Oral Argument Transcript, Pierce, September 25, 2013 at P56:23-25; P26:1-18. (“As Dr. Rakow indicated earlier in discussions, as part of the baseload diversification docket the Department evaluated retiring Boswell 4 and determined it would not be cost-effective under any scenario or contingency. And among the things that we evaluated were retrofit costs or compliance costs higher than are being proposed in this particular docket for adding scrubbers and fabric filters. And it was still -- Boswell 4 remained a least cost alternative in MP’s coal-fired generation”). See also, *In re Minnesota Power’s Baseload Diversification Study*, Docket No. E015/RP-09-1088, PUBLIC COMMENT OF THE DEPARTMENT OF COMMERCE, (May 7, 2013) ,p23 (“However, initial Department analysis determined that, at the expected level of environmental compliance costs, retiring Boswell 4 is not a cost-effective option. Therefore, the Department removed this generic retirement unit from consideration in the base case (and preferred case), but studied retirement as an option in a separate scenario.”).

¹⁶ Oral Argument Transcript, Pierce, September 25, 2013 at P26:1-18 (“Now, understandable, MP has a huge fleet of coal-fired generation. And when you get into the resource plan this afternoon, you’ll find that they are planning to retire Taconite Harbor 3, they’re planning to refuel Laskin, there are some other coal plants that may, if not currently be at the threshold at which we should be considering retiring or refueling, or on the borderline, but Boswell 4 is not one of them. And for that reason we recommend that you go ahead with this particular plan.”)

construction timeline. Continued delay due to additional analysis could potentially further increase costs in the following two ways: (1) again changing the construction timeline and increasing construction costs; and (2) if the construction timeline is changed significantly, outage management costs for the tie-in outage may increase. Minnesota Power explained at oral argument:

We are now facing certain EPA deadlines for MATS compliance on Boswell 4 by early 2016. The record shows that our customers need Boswell 4 as part of their long-term energy mix and we need to proceed with a Boswell 4 retrofit to meet compliance and avoid adding additional costs to that project that would only harm our customers.¹⁷

III. CONCLUSION

Given the adequate and thorough treatment of the issues the Environmental Intervenors raise in their Request for Reconsideration throughout the docket and the Commission's eventual decision in its Approval Order, LPI sincerely hopes the Commission will reject the Environmental Intervenors' Request for Reconsideration. The issues have been adequately and correctly addressed by the parties with the statutory authority and functional expertise to do so. In addition further delays would only exacerbate costs and delay the benefits of the project.

Dated: December 5, 2013

Respectfully submitted,

STOEL RIVES LLP

/s/ Andrew P. Moratzka

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ATTORNEYS FOR THE LARGE POWER
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¹⁷ Oral Argument Transcript, September 25, 2013 at P9:23-25; P10:1-4.

CERTIFICATE OF SERVICE

I, Marion Lemke, hereby certify that I have this day served a true and correct copy of the following document to all persons at the addresses indicated below or on the attached list by electronic filing, electronic mail, courier, interoffice mail or by depositing the same enveloped with postage paid in the United States Mail at Minneapolis, Minnesota.

LARGE POWER INTERVENORS' ANSWER TO REQUEST FOR RECONSIDERATION

In the Matter of Minnesota Power's Petition for Approval of the Rider for Boswell Energy
Center Unit 4 Emission Reduction
Docket No. E015/M-12-920

Dated this 5th day of December, 2013.

/s/ Marion Lemke

Marion Lemke

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