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March 31, 2015

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Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2147

Re: *In the Matter of the Request of Minnesota Power for a Certificate of Need for the Great Northern Transmission Line Project*
MPUC Docket No. E015/CN-12-1163

Dear Mr. Wolf:

After review of the ALJ's Findings of Fact, Conclusions of Law, and Recommendation ("ALJ Report") in the above-referenced matter, the Minnesota Department of Commerce, Division of Energy Resources ("DOC-DER") respectively offers the following clarification to the ALJ Report, Finding No. 185:

185. In this proceeding, the DOC-DER did not perform an analysis of the 2010 AFR or 2013 AFR, nor did it develop alternative forecasts to determine if Minnesota Power has a need for energy and capacity. Rather, the DOC-DER concluded that the issue of need has been adequately reviewed and accepted by the Commission in the 2010 Resource Plan Docket, 250 MW PPA Docket, and 2013 Resource Plan Docket, based on analyses conducted by the Department in those proceedings. Further, the Department noted that the requested certificate of need is required to deliver a generation resource that the Commission has already authorized. However, the Department confirmed in this proceeding that recent sales data for Minnesota Power shows that the 250 MW of generation continues to be needed to serve MP's customers reliably. Therefore, the DOC-DER confirmed that ~~summarily concurs with Minnesota Power that has a need exists~~ for the proposed Project.²⁶²

²⁶² *Id.* at 3-13.

The purpose of this exception is to add clarity regarding DOC-DER's evaluation of project need in this case. The record demonstrates that not only did DOC-DER evaluate Minnesota Power's ("MP") claimed energy demand, but that it also evaluated whether purchasing power from Manitoba Hydro was the best resource, as part of MP's 2010 Resource Plan Docket No. E-015/RP-09-1088, 250 MW PPA Docket No. E-015/M-11-938, and 2013 Resource Plan Docket No. E015/RP-13-53. In addition, DOC-DER evaluated Regional Energy Information System data and determined that MP would have energy capacity deficits for both summer and winter for the period 2015 through 2019 without the project. DOC-DER, in summary, concluded that 250 MW of generation continues to be needed to serve MP's customers reliably.

Thank you for your attention to this matter.

Sincerely,

/s/ Peter E. Madsen
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