

June 30, 2023

**VIA E-FILING ONLY**

Mr. Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7th Place East, Suite 350  
St. Paul, MN 55101

**Re: Reply Comments**

**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  
MPUC Docket No. ET-2/TL-21-434**

Dear Mr. Seuffert:

Nexus Line, LLC (“Nexus”) respectfully submits these comments pursuant to the Notice of Comment Period on Change of Financial Assurance (“Notice”) issued by the Minnesota Public Utilities Commission’s (“Commission”) on May 15, 2023. The issue open for comment in the Notice was Nexus’ May 3, 2023, petition requesting the Commission approve a change in the decommissioning financial assurance mechanism from the current letter of credit to a guaranty.<sup>1</sup>

The only comments submitted to date is the short letter from the Minnesota Department of Commerce, Energy Environmental Review and Analysis (“EERA”), dated June 26, 2023, stating that the EERA had no comment regarding the appropriateness of the proposed change in financial assurance.<sup>2</sup>

As there is no opposition to Nexus’ May 3, 2023, petition, Nexus respectfully requests that the Commission approve the change in Nexus’ decommissioning financial assurance mechanism from the current letter of credit to a guaranty. Upon issuance of a written order, Nexus will then shortly thereafter coordinate execution of the guaranty with the Commission.

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<sup>1</sup> Nexus Compliance Filing – Letter of Credit (May 3, 2023) eDocket No. [20225-185452-03](#).

<sup>2</sup> EERA Comments (June 23, 2023) eDocket No. [20236-196829-01](#).

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To ensure timely termination of the letter of credit, Nexus requests that, on the day the guaranty is signed, the Commission return the original letter of credit via overnight FedEx mail to the following address:

BNC National Bank  
322 E. Main Avenue  
Bismarck, ND 58501  
Attention: Chad Scott

Nexus requests that the Commission provide a copy of the FedEx tracking information to the parties on the official service list in this docket. The letter of credit should be accompanied by a separate letter addressed to the Bank, using the same address provided above, declaring that the Commission agrees that the letter of credit is cancelled without further action. This will give the Bank the authority to cancel the letter of credit and release Nexus and the Bank from its obligations thereunder.

Please feel free to reach out to me with any questions regarding this filing.

Sincerely,

FREDRIKSON & BYRON, P.A.

*/s/ Christina K. Brusven*

Christina K. Brusven

**Direct Dial:** 612.492.7412

**Email:** cbrusven@fredlaw.com

**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**

**MPUC Docket No. ET-2/TL-21-434**

**CERTIFICATE OF SERVICE**

Maia M. Martinez certifies that on the 30th day of June 2023, she e-filed on behalf of Nexus Line, LLC a true and correct copy of Nexus' reply comments via eDockets ([www.edockets.state.mn.us](http://www.edockets.state.mn.us)).

Said documents were also served as designated on the Official Service List on file with the Minnesota Public Utilities Commission and attached hereto.

*/s/ Maia M. Martinez*

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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
VJ	Arganwal	agarwalvj@gmail.com		N/A	Electronic Service	No	OFF_SL_21-434_Official Service List
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	60 S 6th St Ste 1500 Minneapolis, MN 55402-4400	Electronic Service	No	OFF_SL_21-434_Official Service List
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-434_Official Service List
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_21-434_Official Service List
Lucas	Franco	lfranco@liunagro.com	LIUNA	81 Little Canada Rd E Little Canada, MN 55117	Electronic Service	No	OFF_SL_21-434_Official Service List
Allen	Gleckner	gleckner@fresh-energy.org	Fresh Energy	408 St. Peter Street Ste 350 Saint Paul, Minnesota 55102	Electronic Service	No	OFF_SL_21-434_Official Service List
Sachiko	Graber	sachiko.graber@TNC.ORG	The Nature Conservancy in Minnesota, North Dakota and South Dakota	1101 West River Parkway Suite 200 Minneapolis, MN 55415-1291	Electronic Service	No	OFF_SL_21-434_Official Service List
Erik	Hatlestad	erik@cureriver.org	Cure River	117 1st St Montevideo, MN 56265	Electronic Service	No	OFF_SL_21-434_Official Service List
Kristin	Henry	kristin.henry@sierraclub.org	Sierra Club	2101 Webster St Ste 1300 Oakland, CA 94612	Electronic Service	No	OFF_SL_21-434_Official Service List
John	Ihle	ljihle@rrt.net	PlainStates Energy LLC	27451 S Hwy 34 Barnesville, MN 56514	Electronic Service	No	OFF_SL_21-434_Official Service List
Veda	Kanitz	vmkanitz@gmail.com		N/A	Electronic Service	No	OFF_SL_21-434_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Dan	Leshner	dlesher@greenergy.com	Great River Energy	12300 Elm Creek Blvd Maple Grove, MN 55369	Electronic Service	Yes	OFF_SL_21-434_Official Service List
Ronald	Meier	rmeier@mcleodcoop.com	Mcleod Cooperative Power	3515 11th St East Glencoe, MN 55336	Electronic Service	No	OFF_SL_21-434_Official Service List
Peder	Mewis	pmewis@cleangridalliance.org	Clean Grid Alliance	570 Asbury St. St. Paul, MN 55104	Electronic Service	No	OFF_SL_21-434_Official Service List
Evan	Mulholland	emulholland@mncenter.org	Minnesota Center for Environmental Advocacy	1919 University Ave W Ste 515 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_21-434_Official Service List
Duane	Ninneman	duane@cureriver.org	Clean Up the River Environment	117 South 1st St Montevideo, MN 56265	Electronic Service	No	OFF_SL_21-434_Official Service List
Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	OFF_SL_21-434_Official Service List
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-434_Official Service List
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-434_Official Service List
Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance	570 Asbury St Ste 201 Saint Paul, MN 55104	Electronic Service	No	OFF_SL_21-434_Official Service List
Cooper	Stewart	cooper@strongholdicf.com		N/A	Electronic Service	No	OFF_SL_21-434_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Timothy	Sullivan	tsullivan@whe.org	Wright Hennepin Coop. Electric Assn.	6800 Electric Drive PO Box 330 Rockford, MN 55373	Electronic Service	No	OFF_SL_21-434_Official Service List
Sam	Villella	sdvillella@gmail.com		10534 Alamo Street NE  Blaine, MN 55449	Electronic Service	No	OFF_SL_21-434_Official Service List