

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

Beverly Jones Heydinger
David C. Boyd
Nancy Lange
J. Dennis O'Brien
Betsy L. Wergin

Chair
Commissioner
Commissioner
Commissioner
Commissioner

**In the Matter of the Application of
Minnesota Power for a Certificate of
Need for the Great Northern High
Voltage Transmission Line Project**

**Regional Utilities' Comments
on Application**

Docket No. E015/CN-12-1163

These comments are being jointly submitted by Northern States Power Company d/b/a Xcel Energy, Otter Tail Power Company, Great River Energy and Missouri River Energy Services. We are each transmission owners within the Midcontinent Independent System Operator, Inc. ("MISO") region, and each is also a participant within the CapX2020 joint regional transmission planning efforts.

We believe it is important that major transmission additions in our region be well coordinated to meet as many system needs as possible with the least impact. The system configuration chosen to meet the needs identified in this docket will not only have near term impacts on system performance and the environment but will also affect transmission decisions in the future. Thus, we have actively participated in the MISO transmission service request process initiated by Minnesota Power and Manitoba Hydro and are available to assist the Commission in developing a full record that examines the alternatives to meet the needs presented in this docket.

In its October 22, 2013 notice requesting comments on Minnesota Power's certificate of need application for the Great Northern Transmission Line ("GNTL"), the Commission requested comments on the following issues:

1. Does the application contain the information required by Minnesota Rules, part 7849.0220, subpart 2?
2. Are there any contested issues of fact with respect to the representations made in the application?

We believe the application contains sufficient information addressing the required application content requirements to proceed with processing and analyzing the certificate of need application. However, as part of the examination of alternatives, we believe there are several facts in the application and in system planning that merit additional record development beyond just exchanging comments.

As noted by Minnesota Power, a western 500 kV alternative to the Fargo area has been explored in the MISO process (the "Western Option"). The Western Option provides a reasonable alternative to meet Minnesota Power's current needs, facilitates use of the Commission-authorized, double-

circuit-ready 345 kV line from Fargo to Monticello to address the potential need for future transmission capacity expansion, and collectively offers a cost effective solution at higher power transfer levels that may be required in the future. We believe the Western Option can be developed in time to meet the needs presented and are willing to do so if called upon by the Commission.

We have conducted studies beyond those Minnesota Power presented in its application and are prepared to provide this information to the Commission to develop a complete record related to the Western Option. We also believe the record would benefit from an opportunity to further evaluate and develop the implications of the numerous technical studies presented, or referred to, by Minnesota Power. We are prepared to present information comparing future scenarios and costs related to various expansion plans to assist in record development.

CONCLUSION

We believe the application submitted by Minnesota Power is complete, however, it is important for the Commission to have as much information as possible regarding system alternatives before choosing major new regional infrastructure.

Date: November 19, 2013

Respectfully submitted,

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AFFIDAVIT OF SERVICE

*In the Matter of the Application of Minnesota Power
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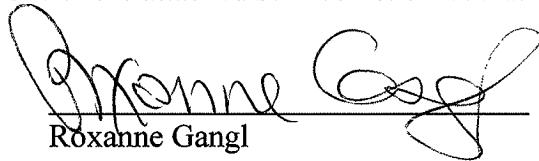
MPUC Docket No. E015/CN-12-1163

STATE OF MINNESOTA)
) ss.
COUNTY OF HENNEPIN)

Roxanne Gangl, of the City of Minneapolis, County of Hennepin, in the State of Minnesota, being duly sworn, says that on the 19th day of November, 2013, she e-filed with the Minnesota Public Utilities Commission the following:

- 1. Regional Utilities' Comments on Application; and**
- 2. Affidavit of Service.**

A copy has also been served in accordance with the attached service list of record.



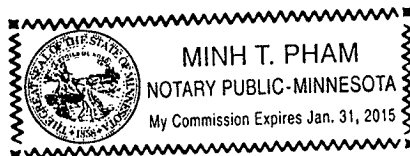
Roxanne Gangl

Subscribed and sworn to before me this 19th day of November, 2013.



(SEAL)

Notary Public, Hennepin County, Minnesota
My Commission Expires 1.31.2015



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